	encroachment (students, visitors, plants and toxins). Typically these fences are 2 feet concrete base with open iron bars above to a maximum of 6 feet.	
The proposed project has the potential to impact nesting birds during vegetation clearing associated with the increased fuel modification/brush management zones.	**MM BR-5** In order to comply with the Federal Migratory Bird Treaty Act, and CA Department of Fish and Game (CDFG) Code (which essentially prohibits any take of bird species - including disturbance of eggs, fledglings, nests, or plants/ substrate the nest is located in, or causing adults to abandon nests), the project biologist shall verify that no nesting birds are present on any portion of the project site or nearby vicinity (including off-site areas to be impacted) during grading and construction operations that would be disturbed indirectly or directly by the project, especially during the typical bird breeding season between February 1 and September 15. If any breeding birds would be directly impacted by grading, breeding season work shall be avoided, or the project biologist shall work with EAS and the appropriate wildlife agencies (i.e. US Fish and Wildlife Service and CDFG) to determine appropriate mitigation. **MM BR-6** Prior to any construction activity that would create noise levels above 60 dB within the development area during the raptor breeding season (February 1 through September 15) the biologist shall ensure that no raptors are nesting. If construction occurs during the raptor breeding season a preconstruction survey would be conducted and no construction would be allowed within 300 to 500 feet of any identified nest(s) until the young fledge. Should the biologist determine that raptors are nesting, an active nest shall not be removed until after the breeding season.	Less than Significant
The proposed project has the potential to result in indirect temporary impacts to sensitive wildlife species due to noise and dust during construction, and there is a potential for increased erosion due to vegetation modification.	Implementation of Mitigation Measures BR-5 through BR-10 (see above) and adherence to the water quality best management practices as discussed in Section 5.5 of this EIR.	Less than Significant
The proposed project could indirectly impact sensitive vegetation communities by introducing non-native, invasive landscaping.	Implementation of Mitigation Measure BR-10 (see above).	Less than Significant
Section 5.3 - Geology/Soils		
Given the steep slopes and project location within Geologic Hazards Category 53, a "low to moderate risk" geologic hazard area, a potentially significant impact has	**MM GS-1** As part of project structural design and prior to issuance of a grading permit, a detailed subsurface geotechnical investigation shall be performed at both locations proposed for	Less than Significant

been identified with respect to landsliding as a portion of the classroom building and the parking structure would encroach into steep slopes.	development (the classroom building and the parking structure) to provide slope stability/landslide evaluation for the slope zone areas and foundation recommendations for the structures. Future recommended borings shall be described in the existing parking lot(s) adjacent to tops of slopes, and not in sensitive open space areas.	
Section 5.4 – Historical Resources		
No archaeological sites were identified in archaeological surveys conducted; however, there is potential that buried archaeological resources not visible at the surface may be encountered during grading.	**PRIVATE PROJECTS (DATED 6/3/08)** **HISTORICAL RESOURCES (ARCHAEOLOGY)** ***MM HR-1*** **I. Prior to Permit Issuance** A. Entitlements Plan Check 1. Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, but prior to the first preconstruction meeting, whichever is *applicable, the Assistant Deputy Director (ADD) Environmental designee shall* verify that the requirements for Archaeological Monitoring and Native American monitoring have been noted on the appropriate construction documents. B. Letters of Qualification have been submitted to ADD 1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation. 2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project. 3. Prior to the start of work, the applicant must obtain approval from MMC for any personnel changes associated with the monitoring program. **II. Prior to Start of Construction** A. Verification of Records Search 1. The PI shall provide verification to MMC that a site specific records search (1/4 *mile radius) has been completed. Verification includes, but is not limited to a* copy of a confirmation letter from South Coast Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.	Less than Significant

	2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities. 3. The PI may submit a detailed letter to MMC requesting a reduction to the _ mile radius. B. PI Shall Attend Precon Meetings 1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor. a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring. 2. Identify Areas to be Monitored a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits. b. The AME shall be based on the results of a site specific records search as well as information regarding existing known soil conditions (native or formation). 3. When Monitoring Will Occur a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur. b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present. **III. During Construction** A. Monitor(s) Shall be Present During Grading/Excavation/Trenching 1. The Archaeological Monitor shall be present full-time during grading/excavation/trenching activities which could result in impacts to	

	archaeological resources as identified on the AME. The Native American monitor shall determine the extent of their presence during construction related activities based on the AME and provide that information to the PI and MMC. **The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities.** 2. The monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly **(Notification of Monitoring Completion)**, and in the case of ANY discoveries. The RE shall forward copies to MMC. 3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered may reduce or increase the potential for resources to be present. B. Discovery Notification Process 1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate. 2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery. 3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible. C. Determination of Significance 1. The PI and Native American monitor shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below. a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume. c. If resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.	

	IV. Discovery of Human Remains If human remains are discovered, work shall halt in that area and the following procedures as set forth in the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken: A. Notification 1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC; and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior Planner in the Environmental Analysis Section (EAS). 2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone. B. Isolate discovery site 1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenience of the remains. 2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenience. 3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin. C. If Human Remains **ARE** determined to be Native American 1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, **ONLY** the Medical Examiner can make this call. 2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information. 3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with the California Public Resource and Health & Safety Codes. 4. The MLD will have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods. 5. Disposition of Native American Human Remains shall be determined between the MLD and the PI, IF: a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being notified by the Commission; OR;	

b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner.

c. In order to protect these sites, the Landowner shall do one or more of the following:

(1) Record the site with the NAHC;

(2) Record an open space or conservation easement on the site;

(3) Record a document with the County.

d. Upon the discovery of multiple Native American human remains during a ground disturbing land development activity, the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures the human remains and buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 5.c., above.

D. If Human Remains are **NOT** Native American

1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial.
2. The Medical Examiner will determine the appropriate course of action with the *PI and City staff (PRC 5097.98).*
3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with MMC, EAS, the applicant/landowner and the Museum of Man.

V. Night and/or Weekend Work

A. If night and/or weekend work is included in the contract

1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
2. The following procedures shall be followed.

a. No Discoveries

In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSVR and submit to MMC via fax by 8AM of the next business day.

b. Discoveries

All discoveries shall be processed and documented using the existing

procedures detailed in Sections III - During Construction, and IV – Discovery of Human Remains.

c. Potentially Significant Discoveries
If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed.

d. The PI shall immediately contact MMC, or by 8AM of the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.

8. If night and/or weekend work becomes necessary during the course of construction

1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
2. The RE, or BI, as appropriate, shall notify MMC immediately.

C. All other procedures described above shall apply, as appropriate.

VI. Post Construction

A. Preparation and Submittal of Draft Monitoring Report

1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring.

a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report.

b. Recording Sites with State of California Department of Parks and Recreation. The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.

2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
4. MMC shall provide written verification to the PI of the approved report.
5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

	B. Handling of Artifacts 1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued 2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate. 3. The cost for curation is the responsibility of the property owner. C. Curation of artifacts: Accession Agreement and Acceptance Verification 1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable. 2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC. D. Final Monitoring Report(s) 1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved. 2. The RE shall, in no case, issue the Notice of Completion and/or release of the Performance Bond for grading until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.	
The houses at 2544 Collier Avenue and 2746 Copley Avenue are considered locally historically significant structures as they represent Spanish Eclectic architecture. Demolition of these two buildings are proposed as part of the project.	***MM HR-2*** **A – HABS Mitigation** - Prior to the issuance of a demolition permit for relocation proceedings for each individual structure, historical documentation of 2544 Collier Avenue and 2746 Copley Avenue shall be completed. This would include the following: • Historic American Building Survey (HABS) Level I documentation for both properties; and, • Completion of California Department of Parks and Recreation 523 forms (523A – Primary Record and 523 B Building, Structure, Object Record) for both properties. Documentation of the properties is to be completed by an individual or consultant who meets the *Secretary of the Interior's Standards for Professional Qualifications Standards* (36 CFR Part 61) in architectural history, history, or architecture. Completion of California Department of Parks and Recreation Primary Record (DPR 523A-test) and Building Structure and Object Record (DPR 523B-test) for both houses (2544 Collier	*Significant and Unmitigable*

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	Avenue and 2746 Copley Avenue). All of these records are to be completed by a qualified architectural historian or historic architect. A qualified architectural historian or historic architect is an individual who meets the Secretary of Interior's minimum professional qualifications in education and experience for architectural history or historic architecture.	
Section 5.5 – Hydrology/Water Quality		
No significant hydrology/water quality impact is anticipated as a result of the proposed project; therefore, no mitigation measures are proposed.		
Section 5.6 – Land Use		
The proposed project would result in a land use impact associated with a conflict with the transportation element of the community plan related to the provision of off-street (on-site) parking, the urban design element of the community plan related to preservation of architectural variety and residential character of Greater North Park, and the goal to preserve and restore unique or historic structures within the community. Also, the project would require approval of supplemental findings as a result of the impact to historical resources.	No mitigation measure has been identified that would reduce the impact to a level less than significant. Alternatives to the proposed project that would reduce or eliminate this impact are analyzed in Section 9.0 Alternatives in this EIR.	Significant and Unmitigable
Section 5.7 – Noise		
No significant noise impact is anticipated as a result of the proposed project; therefore, no mitigation measures are proposed.		
Section 5.8 – Paleontological Resources		
The proposed project would result in the substantial excavation of potential fossil-bearing geologic formations as project grading would exceed 10 feet in depth cuts.	**MM PR-1** **Private Project (Dated June 3, 2008)** **Paleontological Resources** I. **Prior to Permit Issuance** A. Entitlements Plan Check 1. Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for Paleontological Monitoring have been noted on the appropriate construction documents. B. Letters of Qualification have been submitted to ADD 1. The applicant shall submit a letter of verification to Mitigation Monitoring	Less than Significant

Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the paleontological monitoring program, as defined in the City of San Diego Paleontology Guidelines.

2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the paleontological monitoring of the project.
3. Prior to the start of work, the applicant shall obtain approval from MMC for any personnel changes associated with the monitoring program.

II. **Prior to Start of Construction**

A. Verification of Records Search

1. The PI shall provide verification to MMC that a site specific records search has been completed. Verification includes, but is not limited to a copy of a confirmation letter from San Diego Natural History Museum, other institution or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
2. *The letter shall introduce any pertinent information concerning expectations* and probabilities of discovery during trenching and/or grading activities.

B. PI Shall Attend Precon Meetings

1. Prior to beginning any work that requires monitoring, the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified paleontologist shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Paleontological Monitoring program with the Construction Manager and/or Grading Contractor.
   a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.
2. Identify Areas to be Monitored. Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits. The PME shall be based on the results of a site specific records search as well as information regarding existing known soil conditions (native or formation).
3. When Monitoring Will Occur
   a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.

b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.

III. **During Construction**

A. Monitor Shall be Present During Grading/Excavation/Trenching

1. The monitor shall be present full-time during grading/excavation/trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. **The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities.**
2. The monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly **(Notification of Monitoring Completion)**, and in the case of ANY discoveries. The RE shall forward copies to MMC.
3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as trenching activities that do not encounter formational soils as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for resources to be present.

B. Discovery Notification Process

1. In the event of a discovery, the Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.
2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.

C. Determination of Significance

1. The PI shall evaluate the significance of the resource.
   a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether

additional mitigation is required. The determination of significance for fossil discoveries shall be at the discretion of the PI.

b. If the resource is significant, the PI shall submit a Paleontological Recovery Program (PRP) and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.

c. If resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils) the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been made. The Paleontologist shall continue to monitor the area without notification to MMC unless a significant resource is encountered.

d. The PI shall submit a letter to MMC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.

IV. Night and/or Weekend Work

A. If night and/or weekend work is included in the contract

1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
2. The following procedures shall be followed.
   a. No Discoveries
      In the event that no discoveries were encountered during night and/or weekend work, The PI shall record the information on the CSVR and submit to MMC via fax by 8AM on the next business day.
   b. Discoveries
      All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction.
   c. Potentially Significant Discoveries
      If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed.
   d. The PI shall immediately contact MMC, or by 8AM on the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.

B. If night work becomes necessary during the course of construction

1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
2. The RE, or BI, as appropriate, shall notify MMC immediately.

C. All other procedures described above shall apply, as appropriate.

	V. Post Construction A. Preparation and Submittal of Draft Monitoring Report 1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Paleontological Guidelines which describes the results, analysis, and conclusions of all phases of the Paleontological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring. a. For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report. b. Recording Sites with the San Diego Natural History Museum The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the Paleontological Monitoring Program in accordance with the City's Paleontological Guidelines, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report. 2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report. 3. The PI shall submit revised Draft Monitoring Report to MMC for approval. 4. MMC shall provide written verification to the PI of the approved report. 5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals. B. Handling of Fossil Remains 1. The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued. 2. The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate C. Curation of fossil remains: Deed of Gift and Acceptance Verification 1. The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for this project are permanently curated with an appropriate institution. 2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.	

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	D. Final Monitoring Report(s) 1. The PI shall submit two copies of the Final Monitoring Report to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved. 2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.	
Section 5.9 – Utilities		
The proposed project would require the demolition of three single-family structures and two surface parking lots owned by the Academy which may result in a large amount of solid waste disposal and therefore, would result in a significant solid waste impact. Besides the impact to solid waste, the proposed project would not result in a significant impact to any other pubic utilities.	**MM PU-1** Solid Waste – Prior to the issuance of any building permit, the ADD of LDR shall verify that the Owner/Permittee has developed a comprehensive waste management plan in coordination with the City's Environmental Services Department. **MMPU-2** LDR Plan Check – Prior to the issuance of any permit, including but not limited to, any discretionary action, grading, or any other permits, the Assistant Deputy Director (ADD) shall verify that all the requirements of the Waste Management Plan (as required by Mitigation Measure PU-1) have been shown and/or noted on the Demolition and/or Grading Plans (construction documents). 1. Prior to issuance of a demolition permit, the permittee shall be responsible to arrange a pre-construction meeting. This meeting shall be coordinated with Mitigation Monitoring Coordinator (MMC) to verify that implementation of the waste management plan shall be performed in compliance with the plan approved by Land Development review (LDR) and ESD, to ensure that impacts to solid waste facilities are mitigated to below a level of significance. 2. The plan (construction documents) shall include the following elements for demolition, construction, and occupancy phases of the project as applicable: (a) Tons of waste anticipated to be generated, (b) Material type of waste to be generated, (c) Source separation techniques for waste generated, (d) How material would be reused on-site, (e) Name and location of recycling, reuse, or landfill facilities where waste would be taken if not reused on-site, (f) A "buy recycled" program, (g) How the project would aim to reduce the generation of construction/demolition debris,	Less than Significant

(h) A plan of how waste reduction and recycling goals would be communicated to subcontractors, and

(i) A time line for each of the three main phases of the project as stated above.

3. The plan shall strive for a goal of 50% waste reduction.

4. The plan shall include specific performance measures to be assessed upon the completion of the project to measure success in achieving waste minimization goals. The Permittee shall notify MMC and ESD when:

   (a) A construction permit is issued,

   (b) When construction begins,

   (c) The permittee shall arrange for progress inspections, and a final inspection, as specified in the plan and shall contact both MMC and ESD to perform these periodic site visits during demolition and construction to inspect the progress of the project's waste diversion efforts. Notification shall be sent to:

MMC/Tony Gangitano	Angelee Mullins
Mitigation Monitoring Coordination	Environmental Services Dept.
9601 Ridgehaven Court	9601 Ridgehaven Court
Ste. 320, MS 1102B	Ste. 320, MS 1103B
San Diego, CA 92123-1636	San Diego, CA 92123-1636
(619) 980-7122 or (858) 627-3360	(858) 492-5010
When demolition ends.	

Prior to the issuance of a grading permit, the applicant shall receive approval from the ADD that the Waste Management Plan has been prepared, approved, and implemented. Also, prior to the issuance of the Certificate of Occupancy, the applicant shall submit evidence to the ADD that the final Demolition/Construction report has been approved by MMC and ESD. This report shall summarize the results of implementing the above Waste Management Plan elements, including: the actual waste generated and diverted from the project, the waste reduction percentage achieved, and how that goal was achieved, etc.

Preconstruction Meeting

1. At least thirty days prior to beginning any work on the site, demolition and/or grading, for the implementation of the MMRP, the Permittee is responsible to arrange a Preconstruction Meeting that shall include: the Construction Manager or Grading Contractor, MMC, and ESD and the Resident Engineer (RE), if there is an engineering permit.

	2. At the Preconstruction Meeting, the Permittee shall submit Three (3) reduced copies (11" x 17") of the approved Waste Management Plan to MMC (2) copies and to ESD (1) copy. Prior to the start of demolition, the Permittee/Construction Manger shall submit a construction schedule to MMC and ESD. **During Construction** The Permittee/Construction manger shall call for inspection by both MMC and ESD who would periodically visit the construction site to verify implementation of the Waste Management Plan. **Post Construction** 1. After completion of the implementation of the MMRP, a final results report shall be submitted to MMC to coordinate the review by the ADD and ESD. 2. Prior to final clearance of any demolition permit, issuance of any grading or building permit, release of the grading bond and/or issuance of a Certification of Occupancy, the applicant shall provide documentation that the ADD or LDR and ESD, that the Waste Management Plan has been effectively implemented.	
Section 5.10 – Transportation/Circulation/Parking		
The following operational issues have been identified as significant impacts of the proposed project: • Existing congestion along Oregon Street and Collier Avenue and at the intersection of Oregon Street and Collier Avenue for short periods before and after school; • Onstreet parking, littering and inappropriate behavior such as impeding driveway access or noise;	**MM TCP-1** The Academy shall continue to use a traffic facilitator, which would be two school employees, one on each street, that would be assigned the task of keeping traffic moving during critical drop off and pick up congestion periods. The existing designated pick-up/drop-off location on Copley Avenue shall be maintained (see Figure 5.10-8). In addition, any school personnel that performs the facilitator function shall receive proper police special events safety instruction, wear proper safety clothing and obtain any necessary City authority or permits that may be related to this function. **MM TCP-2** Based on field observations and the new parking structure design and location, the parking structure access shall be limited to right turns in (from Copley) and right turns out. **MM TCP-3** The following measures shall be implemented to reduce impact of students parking on nearby residential streets: • To more closely control these types of issues, a parking control program shall be implemented, similar to the Saint Augustine High School's program. • Each student permitted to drive shall be issued a colored (by class) and numbered	Less than Significant

	(each student) I.D. card, which is displayed on a vehicles dashboard where it is accessible. Vehicle descriptions and license numbers shall be correlated to the student I.D. Areas shall be designated for parking by class and number of students. Anyone that is not accommodated on site in the new parking structure shall be permitted to park in their designated areas. Neighbors and students shall be instructed to report any issues or problems and based on the identification of any student vehicle appropriate enforcement action can be taken. Students shall sign a pledge to comply with school requirements in exchange for the privilege to park at school or on nearby streets. • Reduce the peak AM 30-minute arrival problem by providing a study room with refreshments to encourage early (7:00 AM) arrivals. The more people that arrive before the 7:15 – 7:30 peak arrival time the better. Presently only 8 percent of seniors, 7.6 percent of juniors, 0.55 percent of sophomores and 1.9 percent of freshmen arrive at school before 7:00 AM. **MM TCP-4** Special enforcement shall be scheduled by the City based on,close cooperation with the school's administration or based on citizen complaints. The applicant shall consult with the City to identify other feasible traffic calming measures that may be warranted to ensure continued facilitation and traffic flow during peak pick-up and drop-off periods. **MM TCP-5** During construction of the classroom building, the equivalent of 21 parking spaces shall be provided at a remote location with the provision of busing from the designated off-site location to and from the campus if the proposed parking structure has not been constructed. During construction of the parking structure, which is anticipated to be constructed first, the equivalent of 38 spaces shall be provided at a remote location with the provision of busing from the designated off-site location to and from the campus. If both project components are constructed simultaneously, a total of 59 spaces shall be provided at a remote location with the provision of busing from the designated off-site location to and from the campus.	
The proposed project would still have a significant and unmitigable parking impact due to the proposed deficit of parking spaces proposed on-site per the City's Municipal Code.	No mitigation measure has been identified with the proposed project that would reduce the impact to below a level of significance; however, alternatives are presented in Section 9.0 and if implemented could fully mitigate this impact. The implementation of the proposed project would require the City's discretionary approval of the proposed project, provided that adequate Findings in support of the necessary parking deviation from the Municipal Code.	Significant and unmitigable

Section 5.11 – Human Health/Public Safety/Hazardous Materials		
The implementation of the proposed project would result in a significant human health/public safety/ hazardous materials impact associated with the potential presence of hazardous materials in the structures proposed to be demolished as well as potential fire safety and access.	**MM HH-1** Prior to building demolition, a survey shall be conducted to determine the locations and amounts of asbestos-containing materials (ACMs), lead-based paints (LBPs), and organochlorine pesticides, if any. Based on the potential current and historical presence of LBPs on exterior building surfaces, the potential presence of lead or organochlorine pesticide contamination in shallow soils shall be assessed. Should ACMs or LBPs be encountered in the site structures, a licensed abatement contractor shall be contracted to remove hazardous materials before demolition activities commence. **MM H-2** The proposed project shall comply with the fire safety conditions as identified by the City prior to issuance of the building permit. These conditions include: 1) the establishment of appropriate fuel modification zones as required by the City landscape review; 2) retention/provision of adequate fire/emergency vehicle access on to the campus; 3) sprinklers in the proposed classroom building and subterranean floor of the parking structure; 4) replacement fire hydrant; and, 5) provision of Class 2 Standpipe on the parking structure upper floor.	Less than Significant
Chapter 8 Cumulative Impacts – Water Quality		
As indicated in EIR Section 5.5, implementation of the proposed project in conjunction with development of the cumulative projects could result in the potential for pollutants associated with construction activity, including erosion of soils, petroleum products (oil and grease), hazardous materials, and trash to enter the storm drainage as a result of a storm event. In addition, the proposed project as well as the surrounding development discharges runoff into the San Diego River, which is an existing state impaired water body.	The project and potential cumulative projects would be required to be compliant with the SWRCB requirements and NPDES General Permit Process and implementation of BMPs.	Less than Significant

Source: BRG Consulting, Inc., May 2008

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TABLE ES-2
Comparison of Project Alternatives Impacts To Proposed Project Impacts

Impact Category	1A: No Project/ Development Under Existing Approvals	1B: No Project/No Development (Existing Conditions)	2: No Classroom Building + 2-Level Parking Structure	3: No Classroom Building + 3-Level Code Compliant Parking Structure	4: Classroom Building + 3-Level Code Compliant Parking Structure	5: Classroom Building + Code Complaint Parking (10 spaces)
Aesthetics/Neighborhood Character	Avoided	Avoided	Similar	Similar	Similar	Similar
Biological Resources	Avoided	Avoided	Less	Similar	Similar	Similar
Geology/Soils	Avoided	Avoided	Similar	Similar	Similar	Similar
Historical Resources	Avoided	Avoided	Less	Less	Similar	Similar
Hydrology/Water Quality	N/A	N/A	N/A	N/A	N/A	N/A
Land Use	Avoided	Less[1]	Less[1]	Less[2]	Less[2]	Less[2]
Noise	N/A	N/A	N/A	N/A	N/A	Similar
Paleontological Resources	Avoided	Avoided	Less	Less	Similar	Similar
Utilities	Avoided	Avoided	Less	Less	Similar	Similar
Transportation/Circulation/Parking	Similar/Less*	Similar	Similar	Similar/Less	Similar/Less	Similar/Less
Human Health/Public Safety/Hazardous Materials	Avoid	Avoid	Similar	Similar	Similar	Similar

Source: BRG Consulting, Inc., 2008

Notes: N/A = No significant impact identified associated with the proposed project.

1 = This alternative would avoid the impact related to compliance with the City's Historical Regulations and Community Plan objectives; however this alternative would not avoid the impact associated with Municipal Code parking requirements.

2 = This alternative would avoid the impact related to compliance with the City's Municipal Code parking requirements; however, this alternative would not avoid the impact associated with the Historical Regulations and Community Plan objectives.

* This alternative would avoid the impact associated with compliance with City parking requirements.

1.0 INTRODUCTION

The proposed project is an amendment to the existing CUP/RPO #92-0769 for the proposed expansion of the existing Academy of Our Lady of Peace private high school in the City of San Diego. The proposed project site is located within the Greater North Park Community Planning Area. Specifically, the project site is located at 4860 Oregon Street, and is accessed via Copley Avenue, Oregon Street, and Collier Avenue. The Academy of Our Lady of Peace is a Catholic college preparatory all-girl high school and has operated continuously on the project site as an educational institution since 1925. The entire Academy property comprises eight parcels and is approximately 24 acres in size. The property extends into the steep, canyon areas to the north and west towards Texas Avenue; however, the existing campus development is restricted primarily to the flatter portions of the property, adjacent to existing streets. Proposed new development would be located primarily in currently developed areas, adjacent to existing Academy buildings.

The proposed project involves an amendment to the existing Conditional Use Permit/Resource Protection Ordinance (CUP/RPO #92-0769) to address the current and future operational and academic needs of the college preparatory school. CUP/RPO #92-0769, approved by the City of San Diego in 1995, granted permission to demolish an existing swimming pool and three single-family residences; construct a new 12,200 square foot gymnasium/multi-purpose building; construct a landscaped courtyard with outdoor amphitheater; construct a new pedestrian entrance; construct four parking lots and a new school sign; make modifications to the existing landscaping and perimeter walls; and continue the existing senior high school use of the property. CUP/RPO #92-0769 allowed for a maximum enrollment of 640 students and 46 staff. (The CUP/RPO #92-0769 is provided as Appendix J of this EIR). As currently proposed, the 2008 CUP Amendment would include the following major components:

- Demolition of three single-family residences (two of which are considered locally historic);
- Construction of a two-story classroom building to provide 21,059 square feet of classrooms, science laboratories, art studios, and a library/media center;
- Construction of a two-level parking structure to provide 94 on-site parking spaces and removal of currently designated North and South Terrace parking. The two-level parking structure would consist of one subterranean level and one at-grade level;
- Renovation of existing street frontage landscaping for the entire campus;
- Landscape renovation of the point and the meditation garden;
- A maximum enrollment of 750 students;
- Removal of Circle Drive as a designated student drop-off/pick-up location;
- 10-space parking deficit deviation;
- Setback deviation on Copley Avenue; and,
- Height deviation for classroom building.

Current student enrollment at the Academy is 750 students; which currently exceeds the existing CUP permitted enrollment level of 640 students. Therefore, the proposed CUP Amendment (summarized in Table 3-1, EIR Chapter 3.0) request would not result in an increase in student enrollment over the existing, physical conditions that exist today. The amendment would allow the Academy to continue to operate legally at this enrollment level. The CUP Amendment would also permit other project improvements consisting of a new classroom building, a parking structure and renovated landscaping, which are proposed to accommodate this maximum enrollment level.

The proposed classroom building and parking structure would be constructed during the course of approximately one year, once funding is secured for each of these project components.

1.1 Notice of Preparation

A public Notice of Preparation (NOP) for the Draft Environmental Impact Report (EIR) was published in the San Diego Daily Transcript and distributed on February 7, 2008. The NOP was distributed to applicable federal government and State of California agencies, various City of San Diego and County of San Diego departments, and other interested organizations and individuals. The City of San Diego received comment letters from the State Clearinghouse; the Department of Toxic Substances Control (February 25, 2008); San Diego County Archaeological Society, Inc. (February 16, 2008); and, the Native Heritage Commission (February 14, 2008). A copy of the NOP, City-issued scoping letter, the NOP distribution list, and public comment letters received on the NOP are provided in EIR Appendix A. All comments were reviewed and relevant issues raised have been addressed in this EIR.

1.2 Intended Uses of this EIR

The primary intended use of this Project EIR is to provide environmental documentation in accordance with the California Environmental Quality Act (CEQA). The EIR is intended to address all potential environmental effects associated with the project and identify all of the local governmental approvals necessary to implement the project, whether explicitly listed or not. The key environmental issues and alternatives addressed in this EIR were determined by the City of San Diego, based on the scope of the proposed project and public input on the NOP. The main environmental issues are: Aesthetics/Neighborhood Character; Biological Resources; Geology/Soils; Historical Resources; Human Health/Public Safety/ Hazardous Materials; Hydrology/Water Quality; Land Use; Noise; Paleontological Resources; Utilities; and, Transportation/Circulation/Parking.

1.3 Discretionary Actions and Permits Required

Prior to project implementation, project approval by the City is required. Such approval would include certification of the Final EIR and issuance of an amendment to the Conditional Use Permit. A Planned Development Permit, and a Site Development Permit would also be required. Additionally, construction of the proposed project would require the following City-issued permits: 1) grading permit, 2) demolition permit, and 3) building permit. The project is defined as a process four, pursuant to the City's Municipal Code, and would be heard by the Planning Commission. It is currently not anticipated that other local, state, or federal approvals would be required for project implementation.

2.0 ENVIRONMENTAL SETTING

2.1 Regional Setting

The project site is located within the City of San Diego, which is generally located 15 miles north of the United States International Border with Mexico and approximately 130 miles south of Los Angeles. More specifically, the project site is situated south of Interstate 8 (I-8) and west of Interstate 805 (I-805) within the Greater North Park Community Plan area (Figure 2.1-1). The Greater North Park Community is bound by the communities of Mission Valley to the north, Normal Heights and City Heights to the east, Golden Hill to the south, and Balboa Park and Hillcrest to the west.

The majority of the Greater North Park Community is relatively flat with the exception of an area abutting the slopes of Mission Valley and the canyon areas, including the Burlingame neighborhood, in the southeastern portion of the community (City of San Diego, 1990). As a result, this level topography led to the predominant use of the "gridiron" subdivision patterns in the community (City of San Diego, 1990).

2.2 Surrounding Land Uses

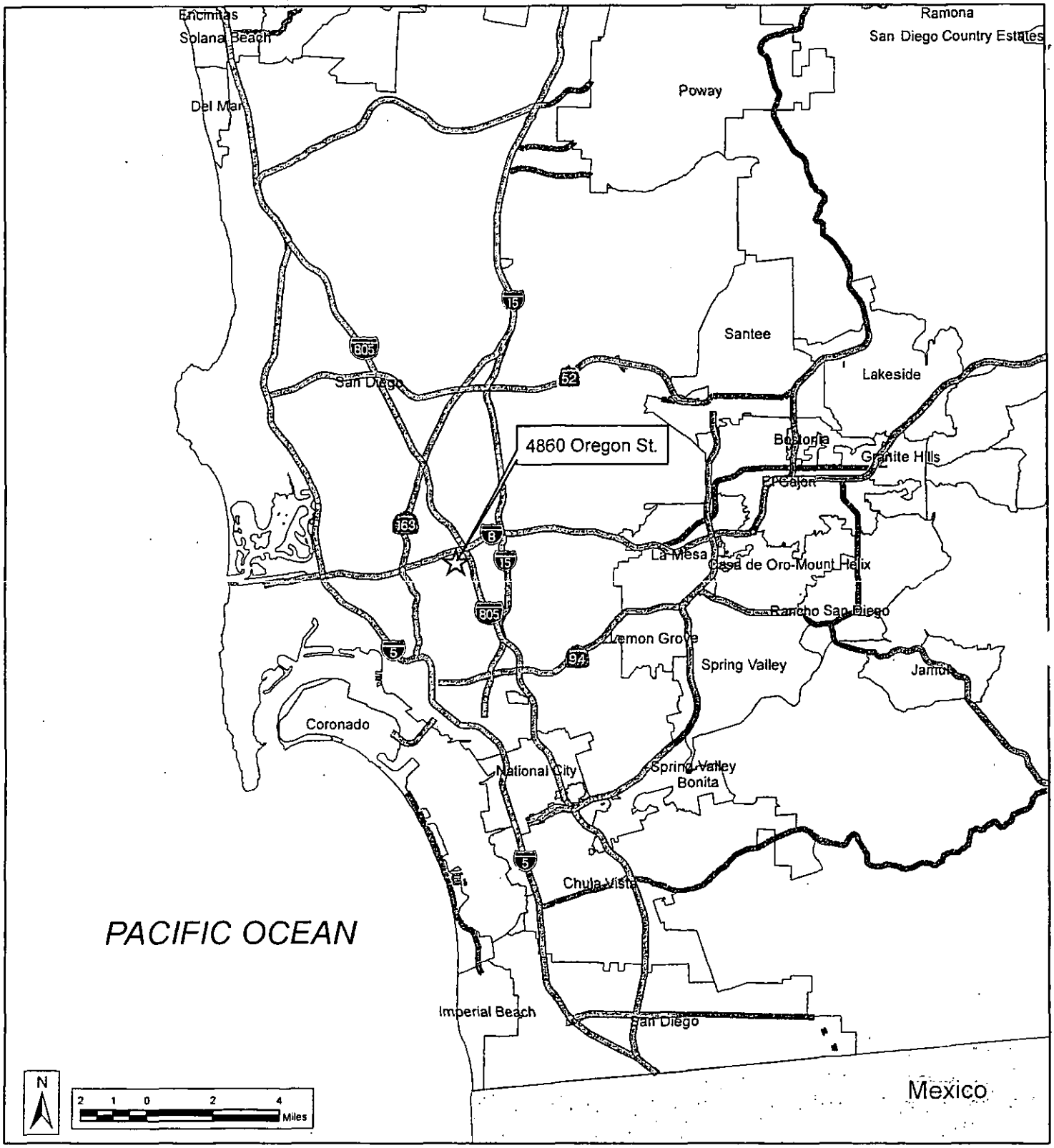
The project site's primary address and official entrance is 4860 Oregon Street; however, the site fronts along Collier Avenue, Oregon Street, and Copley Avenue. A single-family neighborhood has developed around the Academy since the school moved there in 1925. To the north and west, steep, undeveloped canyons that extend down to Texas Street surround the existing school campus. Figure 2.1-2 depicts the community plan land uses of the project site and immediately surrounding area.

2.3 Project Site Setting

The project site comprises eight legal parcels and encompasses approximately 23.3 acres of land (Figures 2.1-3 and 2.1-4). Specifically, legal parcels subject to the proposed CUP Amendment are:

Parcel #1	APN#438-190-02 & APN#438-230-16
Parcel #2	APN#438-230-11
Parcel #3	APN#438-230-12
Parcel #4	APN#438-201-22
Parcel #5	APN#438-201-01
Parcel #6	APN#438-201-03
Parcel #7	APN#438-201-04

The elevation of the site ranges from approximately 385 feet above mean sea level (amsl) in the southern developed portion of the site to approximately 175 feet amsl in the lowest portion. The project site is zoned RS-1-1 and RS-1-7. Figure 2.1-5 depicts the existing zoning of the project site. As shown, the site is zoned RS-1-1 and RS-1-7. The project site is also located within the "Transit Area" and "Brush Zone" overlay zones. The Greater North Park Community Plan designates the portion of the site where the campus is located as



SOURCE: ESRI, 2007,; SanGIS, 2007; and BRG Consulting, Inc., 2007

02/07/08

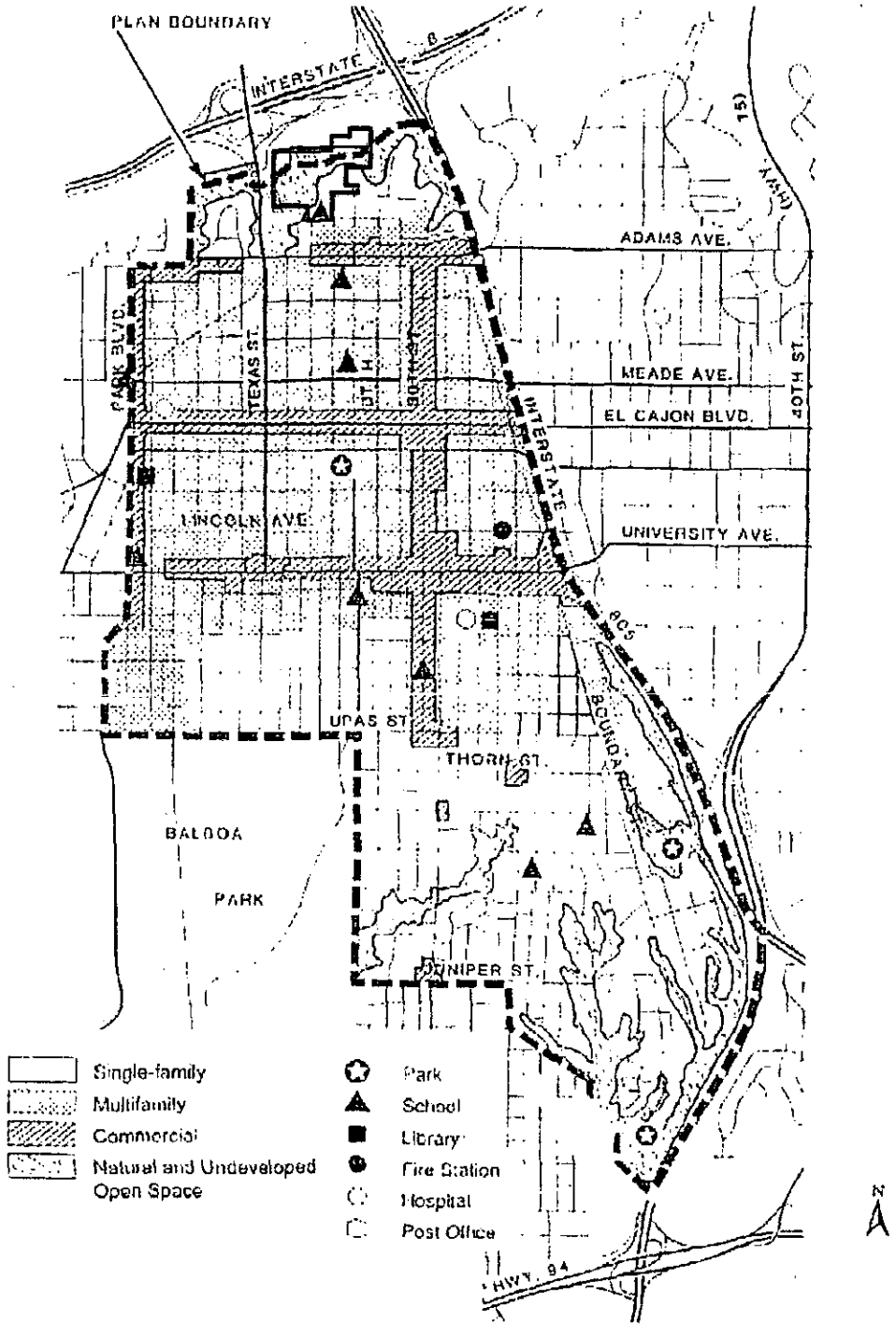
Academy of Our Lady of Peace

Project Vicinity

FIGURE 2.1-1

F:\projects\635 AOLP\GIS\Maps\fig 1 regional vicinity.mxd

000223



SOURCE: BRG Consulting, Inc., 2008

6/27/08

BRG CONSULTING, INC.

Academy of Our Lady of Peace

Greater North Park Generalized Community Plan

FIGURE 2.1-2

P:\projects\635 Academy Our Lady of Peace\3rd Screencheck EIR\Chapter 2\Figure 2.1-2 Generalized Community Plan Map.mxd

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SOURCE: SanGIS, 2006; Digital Globe, 2007 and BRG Consulting, Inc., 2007

01/29/08

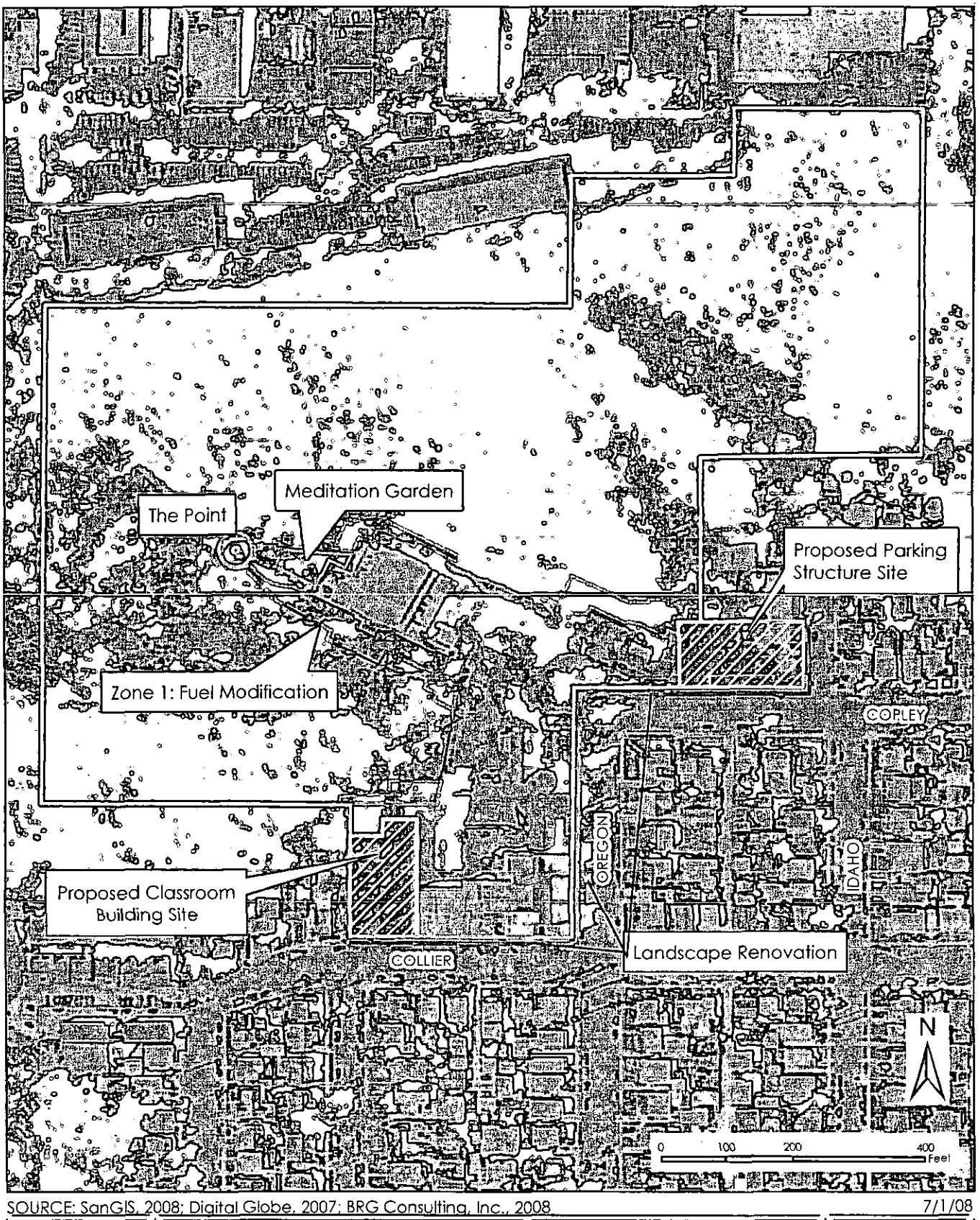
Academy of Our Lady of Peace

Project Location

FIGURE 2.1-3

F:\projects\635 AOLP\GIS\Maps\Fig 2 Project Location.mxd

000225



SOURCE: SanGIS, 2008; Digital Globe, 2007; BRG Consulting, Inc., 2008 7/1/08

BRG CONSULTING, INC.

Academy of Our Lady of Peace

Location of Proposed Development

FIGURE 2.1-4

F:\projects\635 Academy Our Lady of Peace\3rd Screencheck EIR\Chapter 2\Figure 2.1-4 Location of Proposed Development.mxd

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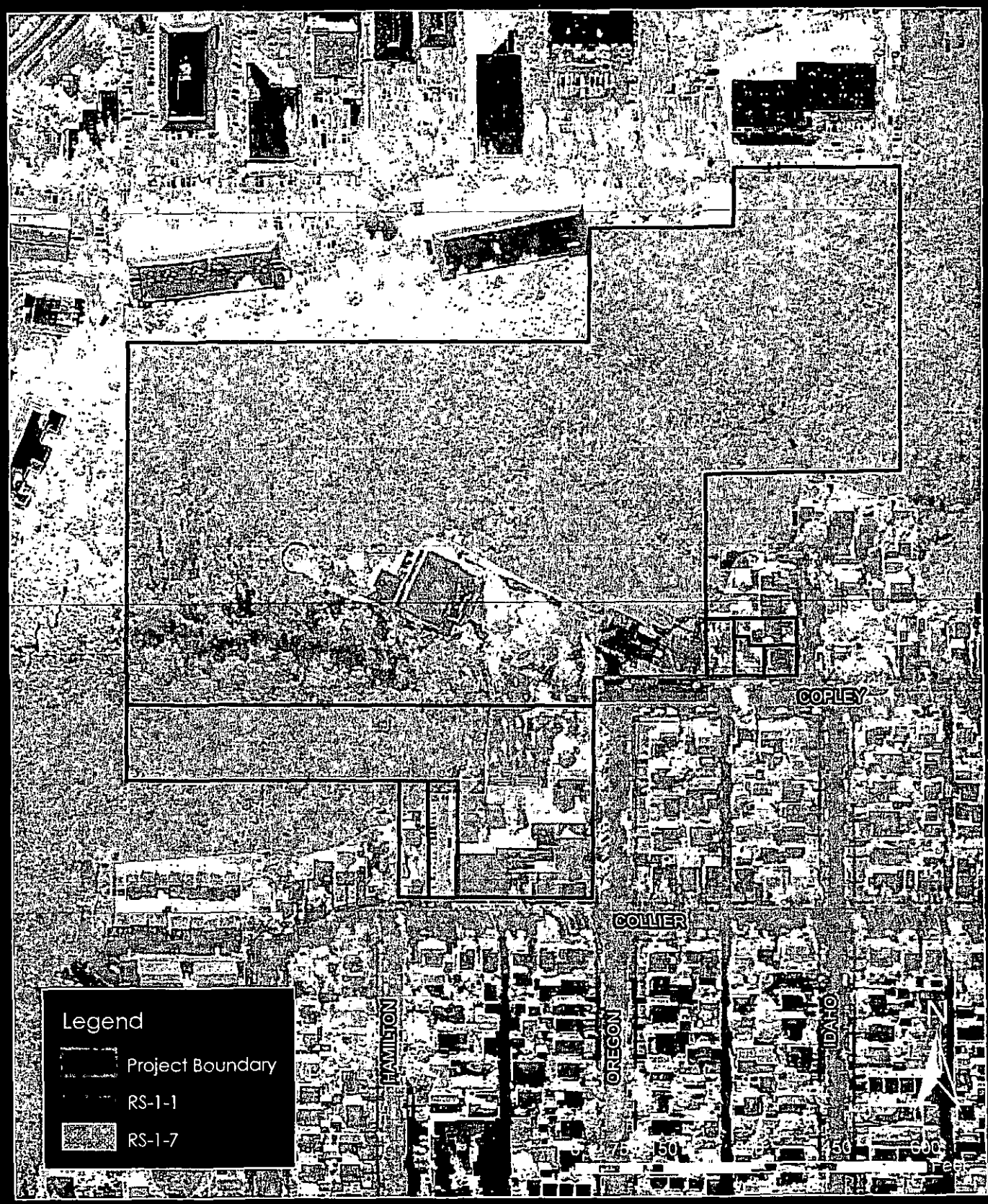

SOURCE: SanGIS, 2006; Digital Globe, 2007; BRG Consulting, Inc., 2007

4/29/08

BRG CONSULTING, INC.

Academy of Our Lady of Peace

Zoning Map

FIGURE 2.1-5

F:\projects\635 Academy Our Lady of Peace\Figure 2.1-5 Zoning Map.mxd

"School" with underlying community plan land uses of "Single-Family" and "Natural and Undeveloped Open Space."

2.3.1 Existing Development

The Academy of Our Lady of Peace, a Catholic, college preparatory all-girl high school, has operated continuously on the project site as an educational institution since 1925. The Academy is currently comprised of eight structures, totaling 86,035 square feet. Buildings constructed on-site range in age of construction from 1920 to 1996. The most recent structure, constructed in 1996, is the Holy Family Event Center, which was constructed under the approved CUP/RPO #92-0769. Existing improvements on the project site also include two surface parking lots, comprising a total of 59 on-site (off-street) parking spaces, landscape areas, and three-single family structures. A majority of the entire Academy property is undeveloped, consisting of steep topography and several vegetation communities. Table 2-1 provides a summary of existing development conditions on the project site.

2.3.2 Existing Conditional Use Permit/Resource Protection Ordinance #92-0769

On December 8, 1994, the City of San Diego Planning Commission approved Conditional Use Permit/Resource Protection Ordinance #92-0769 for the Academy of Our Lady Of Peace. The permit was associated with the Academy's planned expansion and granted permission to AOLP to:

- demolish an existing swimming pool and three single-family residences;
- construct a new 12,200 square foot gymnasium/multi-purpose building;
- construct a landscaped courtyard with outdoor amphitheater;
- construct a new pedestrian entrance;
- construct four parking lots with a total of 106 off-street parking spaces;*
- construct a new school sign;
- make modifications to the existing landscape and perimeter walls;
- continue the existing high school use on the property; and,
- designate an entry loop at Copley Avenue and Oregon Street (aka Circle Drive) (for drop-off and pick-up).*

*=items not completed or partially completed as discussed below in Section 2.3.2.1.

The RPO was specifically required for the variance to permit a height of 32 feet where 30 feet is allowed for the 12,200-square-foot gymnasium/multi-purpose building. This building was constructed in 1996 (Holy Family Events Center).

TABLE 2-1
Existing Development Summary

	Name	Year Constructed	Description
Buildings			
A	Qualiatto Hall	1927	8,140 sq. ft.
B	St. Joseph's Hall	1965	15,290 sq. ft.
C	Aquinas Hall	1927	22,325 sq. ft.
D	St. Cecilia's Hall	1920	5,775 sq. ft.
E	Chapel	1927	2,835 sq. ft.
F	Carondelet Hall	1920	9,130 sq. ft.
G	St. Catherine's	1920	8,995 sq. ft.
H	Holy Family Event Center	1996	13,545 sq. ft.
Total Existing Building Square Footage			**86,035 sq. ft.**
Parking			
	Surface Parking Lot "A"		21 surface spaces
	Surface Parking Lot "B"		38 surfaces spaces
Total Existing Parking			**59 spaces**
Landscape			
	Upper Plaza	2002	
	Lower Plaza	2002	
	Amphitheater	2002	
	North Terrace	1920	
	Meditation Garden	2007	
	The Point	1920	
	Circle Drive	1920	
	Chapel Courtyard	2002	
Single Family Structures			
	2544 Collier Avenue	1931	S.F. residential
	4910 Uvado Place	1928	S.F. residential
	2746 Copley Avenue	1929	S.F. residential

Source: McArdle Associates Architects, Inc., 2007; Lia, 2008

The CUP also stipulated that school enrollment be limited to a maximum of 640 students and 46 staff members. A copy of the previously approved Conditional Use Permit/Resource Protection Ordinance #92-0769 for the Academy of Our Lady Of Peace is provided as Appendix J of this EIR and the Technical Appendices for the reader's reference. Table 2-2 provides AOLP proposed CUP amendments.

TABLE 2-2
AOLP Proposed CUP Amendments

No.	CUP 92-0769	Proposed CUP Amendment	Map #
1	Maximum enrollment 640	Maximum enrollment 750	NA
2	Maximum number of staff 46	Remove staff limit (i.e. staff would be commensurate/appropriate to maximum enrollment needs)	NA
3	North Terrace parking designation	Remove North Terrace parking designation	1
4	Upper Plaza parking designation	Remove Upper Plaza parking designation	2
5	Staff Lot parking designation	Remove Staff Lot parking designation and construct Classroom Building	3
6	NA	Remove residence at 2544 Collier Avenue and construct Classroom Building	4
7	Student Lot parking designation	Construct Parking Facility with 94 spaces	5
8	NA	Remove residence at 2746 Copley Avenue and construct Parking Facility	5
9	NA	Remove residence at 4910 Uvada Place and construct Parking Facility	5
10	Limit on Amphitheater events	Remove limitation	6
11	Limit on Special Events	Modify limitations	NA
12	Circle Drive open for 1-way traffic	Close Circle Drive. Maintain existing pick-up/drop-off location.	7
13	NA	Renovate street frontage landscaping along Collier Ave., Oregon St. & Copley Ave.	8
14	NA	Renovate landscaping at The Point within existing footprint and with non-invasive species	9
15	NA	Renovate landscaping at Meditation Garden within existing footprint and with non-invasive species	10
16	NA	Provide Cafeteria	11
17	NA	specify location of PA loudspeaker	12

Source: BRG Consulting, Inc., 2008

2.3.2.1 *Existing CUP Compliance*

The majority of the improvements allowed under the RPO/CUP #92-0769 were constructed. However, of the four parking lots identified in the CUP, requiring a total of 106 parking spaces, only two were provided, providing a total of 59 spaces. Also, as stated previously, student enrollment at the Academy is currently 750 students with 68 staff, whereas the existing CUP limits enrollment to 640 students and 46 staff. On April 4, 2007 the City issued a Civil Penalty Notice and Order stating that the Academy is in violation of the San Diego Municipal Code Section 12.0801 through 12.0810, and listing the following items as in violation of the existing CUP:

2. The Resource Protection Ordinance/Conditional Use Permit shall include all of the following activities/facilities:

   a. A senior high school with a maximum number of 46 staff and a maximum enrollment of 640 students;

   d. Four off-street parking lots with a total of 106 parking spaces;

3. No fewer than a total of 106 off-street parking spaces shall be maintained on the property. Parking spaces shall be consistent with Division 8 of the Municipal Code and shall be permanently maintained and not converted for any other use. Parking spaces and aisles shall conform to City of San Diego standards.

7. The construction and continued use of this permit shall be subject to the regulation of this or other governmental agencies.

15. All private outdoor lighting shall be shaded and adjusted to fall on the same premises where such lights are located. (Final building plans will contain a code compliant lighting plan to be reviewed and approved by engineering staff prior to the issuance of the building permit.)

The April 4, 2007 Civil Penalty Notice and Order identifies the violations of the RPO/CUP #92-0769 and is provided in this EIR and Technical Appendices as Appendix J.

2.3.3 Police and Fire Service

The proposed project is served by several public services. Two of these services include police and fire. The project site is located in Police Beat 624. Current police services in the North Park/University Heights area would be adequate to serve the proposed project. Police protection to the project site is presently provided by the San Diego Police Department Western Division with an average response time of approximately 5.43 minutes for emergency calls. The Police Department is familiar with the proposed project and noted response times, additional police services, or staff would not be adversely impacted (Pers. Comm., C. Haley, 2008). Therefore, the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered facilities.

Currently, the City of San Diego Fire Department provides four Engines, one Truck and one Battalion Chief to the site. The response time from is 2.8 minutes from Fire Station 18 on Adams Avenue and Felton, 4.1 minutes from Fire Station 14 on 32nd and Lincoln, 4.8 minutes from Fire Station 5 on 9th Avenue and University, and 5.8 minutes from Fire Station 8 on Goldfinch and Washington (pers. Comm., M. Orton, 2008). The Fire Department is familiar with the proposed project and noted response times, additional fire services, or staff would not be adversely impacted. Therefore, the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered facilities.

As depicted in Figure 3-3 in the following section of this EIR, a fire access lane will be provided to the project site adjacent to the proposed classroom building. This access lane will enter the campus at Collier Avenue. All of the access gates and other fire access lanes that currently exist on the project site will continue to remain accessible to the fire department (off Copley Avenue, Collier Avenue, and Oregon Street and

continue to use a Knox key boxes, which allow the fire department to access the school in an emergency without school personnel present. In addition, based on initial consultations and plan reviews with the Fire Department, no turn-a-rounds are required for the proposed project. Furthermore, as discussed in the EIR (i.e., Mitigation Measure HH-2) the proposed project shall comply with all the fire safety conditions required by the City prior to issuance of the building permit.

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3.0 PROJECT DESCRIPTION

3.1 Introduction

The proposed project involves an amendment to the existing Conditional Use Permit/Resource Protection Ordinance (CUP/RPO #92-0769) to address the current and future operational and academic needs of the existing Academy of Our Lady of Peace. Physical improvements associated with the proposed CUP amendment and associated discretionary actions include a new classroom building, a parking structure, and landscape renovations. Figure 3-1 depicts the Academy's proposed updated Campus Site Plan.

The Academy of Our Lady of Peace is located at 4860 Oregon Street, San Diego, California. The school was founded in San Diego in 1882, and moved to its present location in 1925. The core of the campus is the 1917 Van Druff estate, a historical collection of well-maintained Mediterranean-styled buildings and grounds. The school added classroom and dormitory buildings in the 20's, one classroom building in the 60's, renovated the dormitories to classrooms in the 80's and added a gym/multipurpose building the 90's. The school has consistently modernized its facilities in a style consistent with and sensitive to the historical mediterranean core of its campus.

The existing campus is currently comprised of eight buildings, landscaping, and surface parking lots. Total existing building area is 86,035 square feet. The primary physical improvement components of the project include the construction of a two-story classroom building (21,059 square feet), and the construction of a 86-space, two level parking structure (consisting of one subterranean level, and one at-grade level) and eight surface parking spaces to provide a total of 94 on-site parking spaces. The proposed project would also involve the demolition of three single-family residential structures, one located where the classroom building is proposed, and two located where the parking structure is proposed. In addition to physical improvements, the Academy is seeking approval of an Amendment to its existing Conditional Use Permit (CUP/RPO #92-0769) to modify certain operational characteristics of the school and legalize several proposed deviations. The primary modifications are a request to increase the student enrollment from its currently permitted 640 students and 46 staff, to 750 students with no staff limit, modify limits on special events, to remove Circle Drive as a designated drop-off/pick-up location (but continue to use the existing designated Copley Avenue drop-off/pick-up location), and to deviate from required on-site parking by 10 spaces or 9.6 percent. The proposed CUP modifications are listed on Table 3-1.

Other minor deviations and physical improvements of the project would include a two-foot setback deviation for the new proposed parking garage (which would be consistent with the existing wall setbacks) and an overheight deviation for the rear portion of the new proposed classroom. As proposed, 91.36 percent of this building would comply with the zoning building height requirement limit of 30 feet. However 4.2 percent of the building would exceed the height limitation, which is the portion of the structure below street level on the slope at the northwest corner of the building. Also, 3.3 percent of the building's height exceedance is for the tower element and 1.14% is attributed to proposed chimney elements. The project

TABLE 3-1
AOLP Proposed CUP Amendments

No.	CUP 92-0769	Proposed CUP Amendment	Map #
1	Maximum enrollment 640	Maximum enrollment 750	NA
2	Maximum number of staff 46	Remove staff limit (i.e. staff would be commensurate/appropriate to maximum enrollment needs)	NA
3	North Terrace parking designation	Remove North Terrace parking designation	1
4	Upper Plaza parking designation	Remove Upper Plaza parking designation	2
5	Staff Lot parking designation	Remove Staff Lot parking designation and construct Classroom Building	3
6	NA	Remove residence at 2544 Collier Avenue and construct Classroom Building	4
7	Student Lot parking designation	Construct Parking Facility with 94 spaces	5
8	NA	Remove residence at 2746 Copley Avenue and construct Parking Facility	5
9	NA	Remove residence at 4910 Uvada Place and construct Parking Facility	5
10	Limit on Amphitheater events	Remove limitation	6
11	Limit on Special Events	Modify limitations	NA
12	Circle Drive open for 1-way traffic	Close Circle Drive. Maintain existing pick-up/drop-off location.	7
13	NA	Renovate street frontage landscaping along Collier Ave., Oregon St. & Copley Ave.	8
14	NA	Renovate landscaping at The Point within existing footprint and with non-invasive species	9
15	NA	Renovate landscaping at Meditation Garden within existing footprint and with non-invasive species	10
16	NA	Provide Cafeteria	11
17	NA	specify location of PA loudspeaker	12

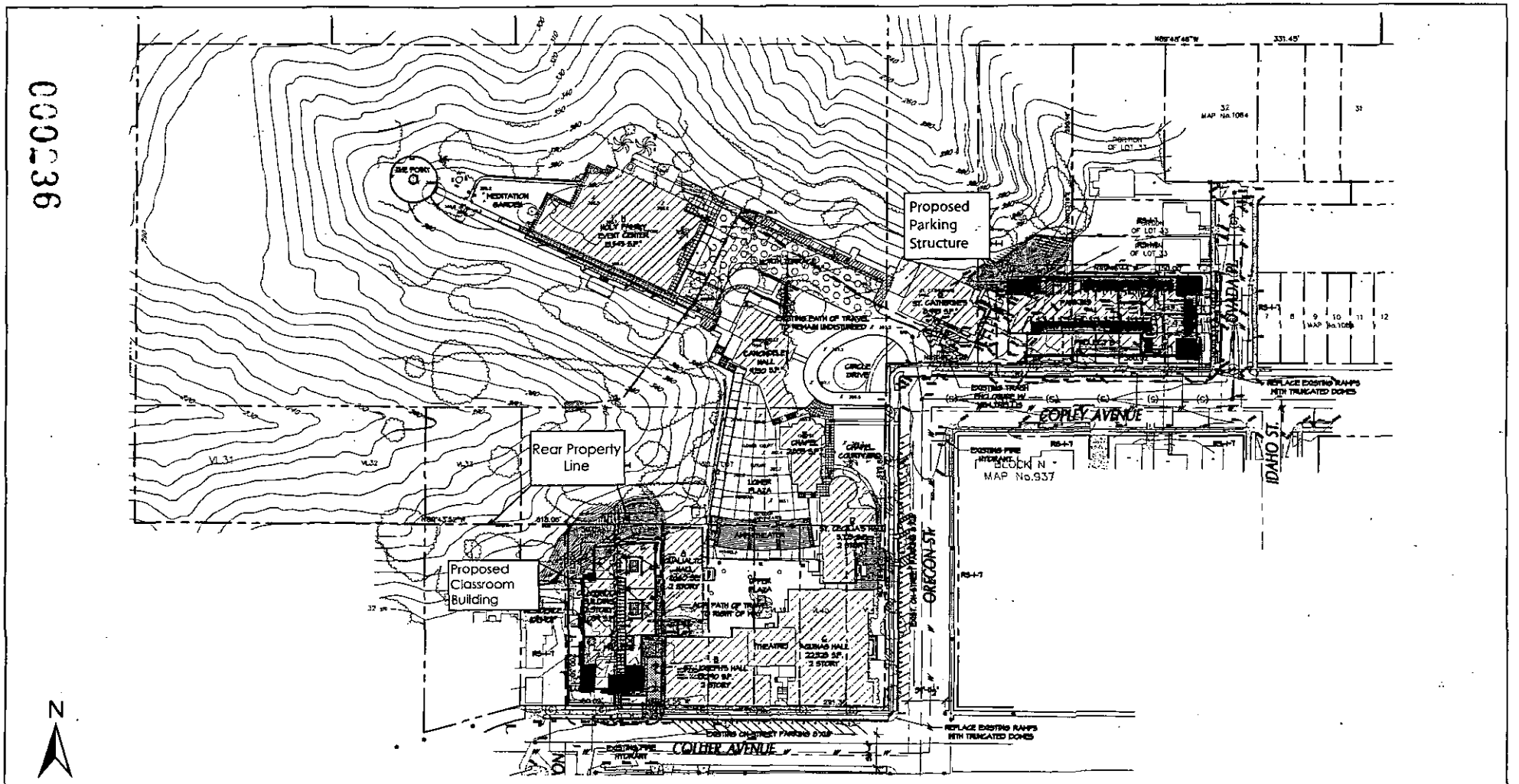
Source: BRG Consulting, Inc., 2008

would also include renovation of all the existing street frontage landscaping for the entire campus (fronting) and landscape renovation of the point and the meditation garden.

The following sections describe the purpose and need of the project, including specific goals and objectives of the project, each primary project component, and lists the discretionary approvals required for project implementation.

3.2 Project Purpose and Need

The Academy is requesting an amendment to its existing CUP that would reflect the current operational conditions of the school: a maximum enrollment of 750 students. The design criteria which are driving the proposed Academy improvements are: the creation and maintenance of an integral campus with all parking, classroom and administrative space within a securable perimeter; provision of a centralized



SOURCE: McArdle Associates Architecture, 2008

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Academy of Our Lady of Peace

Development Plan

FIGURE 3-1

administrative office space with adequate space for all workers; preservation of existing historical areas of the campus; new landscaping of the streets; replacement of substandard classroom and office spaces that are in basements or have pillars which block sight lines; addition of two science labs, an art space (graphic arts, music, painting), a modern media/library center, four additional classrooms, and parking for 94 cars.

The school site is dominated by steep slopes; however, the actual grounds are on a mesa abutting the south edge of Mission Valley. Over 75% of the project parcel; or approximately 23 acres; are defined as steep slopes. To accommodate the modernization contemplated by the new Development Plan, the Academy purchased three homes which abut the property. Two homes are located where parking is planned. The other home is where a new building is planned.

3.2.1 Design Criteria

The need for increased security is the reason for an integral campus. Violence at and around high schools is a critical concern to the Academy. Having a secure, lockable perimeter, with a single monitored at the pedestrian gate entrance on Oregon Street controlling campus access, is a primary design consideration. Parents, faculty and administrators all believe that this simple step would increase safety. As such, the extent that it is possible, it is desirable to have student parking on campus and not located at distant lots.

An enlarged, centralized complex of administration offices offers many advantages: adequate space increases efficiency and organization, parents and visitors can more easily find staff they need, visitors can be more easily monitored; convivial interaction of staff is encouraged; and the need to duplicate expensive equipment is minimized.

In contrast to the original CUP, preservation of the school site's historical grounds and buildings can be better accomplished by the proposed project improvements and therefore would be more in line with the Development Plan envisioned for the campus. The proposed project would reposition the previously designated parking from the north terrace to the new proposed parking structure. This change would reduce degradation of the north terrace from occasional parking on grasscrete and more thoroughly preserve this portion of the original Van Druff estate's landscape design and the OLP graduation grounds (one of the Campus' longest running traditions held in this area) and thereby remove one of the largest errors in the school's current CUP. The current CUP's proposed use of this site for parking is actually inconsistent with this history. The new plan envisions using the historical structures in a manner consistent with their historical nature. With the new space, classic interiors would be more easily preserved by reducing the need to gut them for classroom space and instead dedicate them to more appropriate, efficient use for those spaces, such as a cafeteria, development offices, counseling offices, a convent, are anticipated and several of those uses are already in place.

3.2.2 Project Objectives

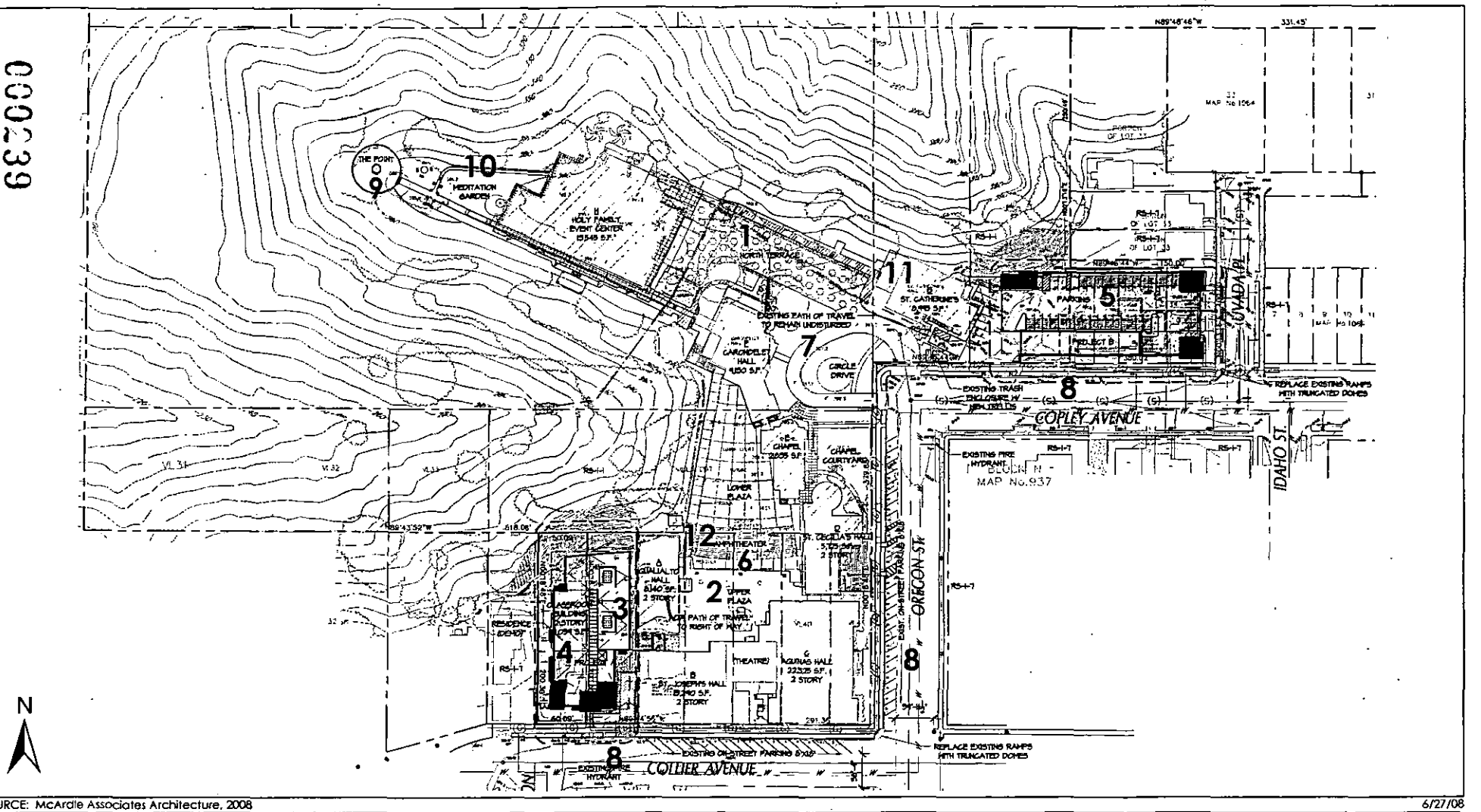
The primary goal of the proposed project is to continue the operation of the school in support of the schools adopted Mission Statement. The current proposed project would update and support the Academy's existing Mission Statement. The Mission Statement is as follows:

> "The Academy of Our Lady of Peace is a Catholic secondary school for young women sponsored by the Sisters of St. Joseph of Carondelet. The mission of the Academy is twofold: to assist and enable parents to fulfill their role as the primary educators, and to inspire its students to grow as committed Christians who are building Christ's kingdom of justice, love, and peace. Through a college preparatory liberal arts program, each student is challenged to become a responsible woman educated to the needs of society."

In support of the Academy's Mission Statement, the goals and objectives of the proposed project are as follows:

- Provide an environment that is conducive to excellent teaching and learning so that each student can reach her fullest potential;
- Incorporate changes to the Academy's campus/implement a Development Plan that would allow AOLP's neighbors, residents and the school to have an agreed upon blueprint for future improvements and a limit on enrollment;
- Meet the design criteria for development of the school;
- Create a "state of the art" campus that preserves and enhances the unique urban character of the Greater North Park community and the campus itself;
- Increase the maximum enrollment allowed from 640 students to 750 students in order to serve the needs of the community;
- Create an integrated campus with all parking, classroom and administrative space contained within a securable perimeter;
- Build a new classroom building to avoid making interior alterations to the existing historic school buildings and therefore maintain the historic integrity of the school;
- Alleviate floating classes and teachers by adding enough classroom space to accommodate the school's enrollment;
- Modernize through provision of a new classroom building which can accommodate technological advancements facilitating education and ensuring students are equipped to compete, contribute and thrive as adults in the new global economy;
- Construct a parking structure to accommodate additional parking on the campus and to allow the North Terrace's and Upper Plaza's historical and architectural character to be maintained by removing this area as a designated parking area in the existing CUP; and,
- Legalize and maintain enrollment at 750 students.

Table 3-1 and Figure 3-2 provide a summary of the CUP conditions that are proposed to be modified with the proposed project.



SOURCE: McArdle Associates Architecture, 2008

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Academy of Our Lady of Peace

Proposed CUP Amendment

FIGURE 3-2

F:\projects\633 Academy Our Lady of Peace\3rd Screencheck EIR\Chapter 3\Figure 3-2 Proposed CUP Amendment.ai

3.3 History of Academy of Our Lady of Peace

The Academy of Our Lady of Peace was founded on May 10, 1882. In 1836, at the invitation of the Bishop of Saint Louis, six Sisters of St. Joseph left France to settle in Carondelet, Missouri. In 1870, they were invited to establish a school in the Arizona territory. Seven sisters left Missouri for Tucson in April, 1870, traveling first to San Francisco by train, then down to San Diego by steamer and overland to Tuscon.

While in San Diego, the Sisters met Father Ubach, pastor of Immaculate Conception parish in Old Town. After this meeting, Father Ubach began his many appeals for Sisters to start a school in his territory. In 1875, Father Ubach built St. Joseph's Church in Horton's New Town and continued to press for a school. Finally on April 18, 1882, the first permanent community of the Sisters of St. Joseph of Carondelet arrived in San Diego and rented two small frame houses at Second and "G" Streets. On May 10 they began their day school in one of the houses with 28 girls and two boys, and on June 13, the first Mass was said in the Convent Chapel which was dedicated to Our Lady of Peace.

Within two years enrollment increased and the two houses became inadequate, so the Sisters purchased land at Third and "A" Streets. Academy Hall on Third near "B" and St. Joseph's Boys' School on Second near "B" were built in the next 10 years.

By the mid-1920s it was necessary to expand again and in 1924 the Sisters of St. Joseph acquired the former Vandruff Estate at Copley and Oregon Streets. The 20 acres of land overlooking Mission Valley had spacious gardens, a swimming pool and three large buildings. Two had been planned as residences and the third as a scientific laboratory. These buildings were the nucleus of the present day Academy of Our Lady of Peace. However, the Sisters soon realized that these buildings would be inadequate facilities for the students. Plans to build 3 additional buildings began in 1924 and construction of Aquinas Hall, St. Margaret's (now Qualialto Hall), and the Chapel was completed in 1927. The newest classroom building, St. Joseph's, was constructed in 1965.

More recently, the school proposed an expansion to its existing campus and enrollment, for which the City issued a Conditional Use Permit. In 1996 construction began on the Academy's Holy Family Event Center which contains a gymnasium/multi-purpose facility, a weight training room, athletics offices, and a kitchen. This building was dedicated on October 26, 1997.

3.4 Proposed Building Development and Uses

Table 3-2 depicts the overall proposed development summary for the project.

TABLE 3-2
Proposed Building Development Summary

Existing Buildings	86,035 sq. ft.
Proposed Classroom Building	21,059 sq. ft.
Proposed Parking Structure (two-level)	49,358 sq. ft.
Total Building Square Footage With Proposed Project	**156,452**
Existing Site Area (not including 3 single-family lots)	22.73 acres/990,221 sq. ft.
Proposed Site Area (including 3 single-family lots)	**23.28 acres/1,014,264 sq. ft.**
Floor Area Ratio	**0.15**

Source: McArdle Associates Architects, Inc., 2007

3.4.1 Classroom Building

The project proposes the construction of a new 21,059 square foot, two-story classroom building, located on the west side of the existing campus, along Collier Street. The development criteria for the underlying single-family zones allows a maximum structure height of 30 feet measured from the lower of existing or proposed grade. The proposed classroom building's Collier Street frontage, west elevation and east elevation would be consistent with the 30-foot height limit with the exception of three architectural features discussed below. However, due to topography of the site, the proposed classroom would be 43'6" in height as measured from the top of the northwest corner of the building (elevation 422.5 feet) to the point directly below (elevation 379 feet), where the slope drops off toward the canyon.

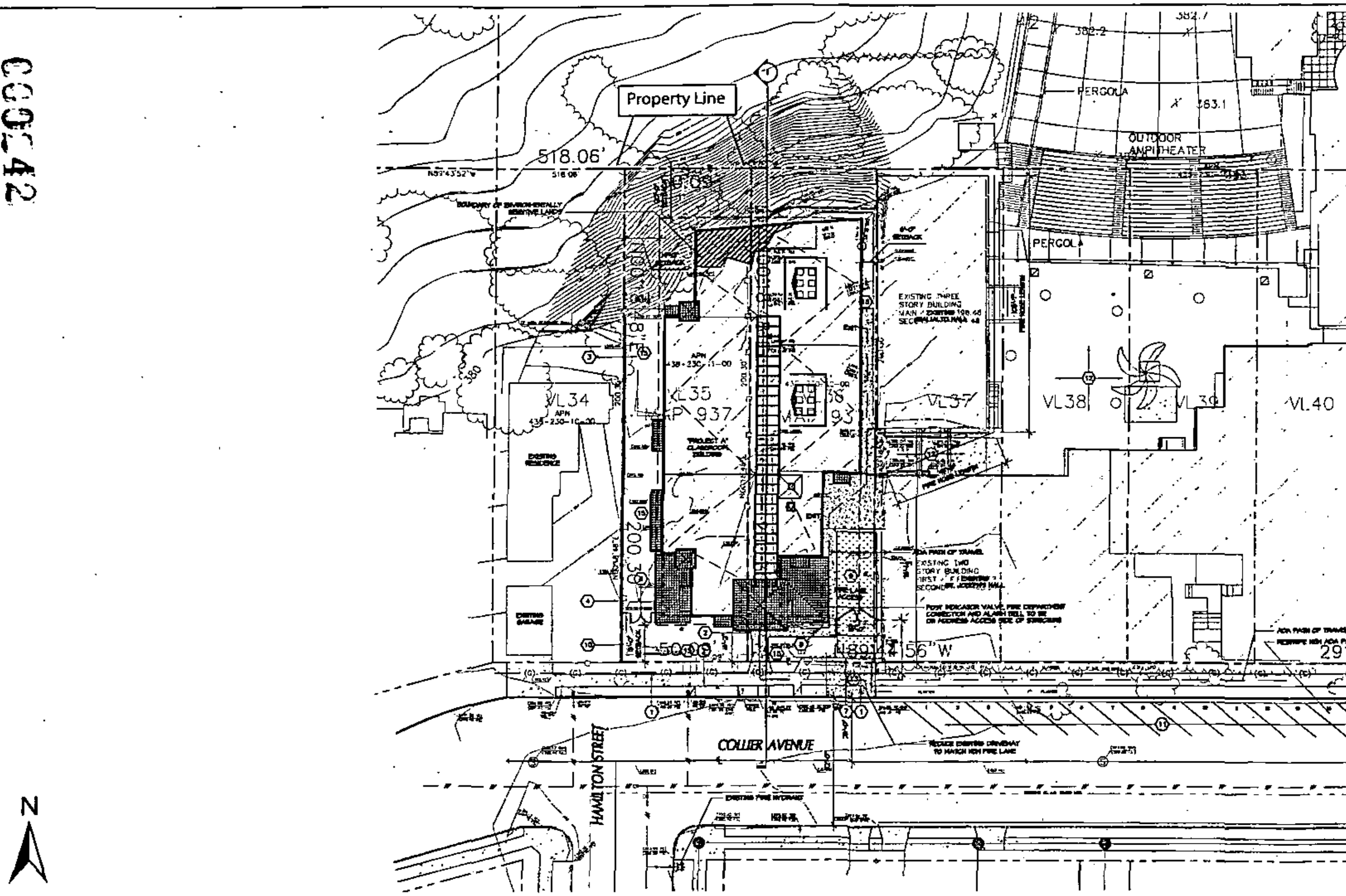
The grade differential within the classroom building footprint is 14'5", and the proposed classroom height deviation occurs at the far northwest corner of the project, at the lowest point on the site, where the slope drops off toward the canyon. Approximately 470 square feet of the northwest corner of the building would exceed the height limitation by 18 feet 6 inches. The portion (4.2%) of the building exceeding the limitation is not visible from any public street, or any public lands and does not disrupt views of Mission Valley from any public or private lands.

The proposed classroom building's Collier Street frontage, west elevation and east elevation would be consistent with the 30-foot height limit with the exception of the tower element and two decorative chimneys.

- The classroom building would be 29 feet 6 inches in height (elevation 422.5 feet) adjacent to Collier Street (south elevation). However, the proposed 367 square foot tower architectural feature would be 35 feet 11 inches in height (elevation 429 feet). This element represents approximately 3.3% of the building footprint.
- Along the west elevation, the classroom building would be consistent with the 30-foot height limit with the exception of two decorative chimney elements, each 64 square feet in size. The chimney feature on the southern end of the west elevation exceeds the height limit by approximately 4 feet 7 inches (elevation 429 feet) and represents approximately 0.57% of the building footprint.
- The chimney element on the northern end of the west elevation is also 64 square feet in size. It exceeds the height limit by approximately 9 feet 6 inches (elevation 429 feet) and represents approximately 0.57% of the building footprint.

These three decorative features reflect neighborhood architectural vernacular and are consistent with the campus and the surrounding neighborhood Spanish Eclectic residential aesthetic.

A Planned Development Permit (PDP) is required for all of the height deviations per §126.0602(b)(1) of the Municipal Code Figure 3-3 depicts the proposed Classroom Site Plan. The proposed classroom building would provide space for classrooms, science laboratories, art studios, a library/media center and teachers lounge. The first floor would provide five classrooms totaling 4,726 square feet, a 3,378 square foot library/media center, restroom facilities and storage. The second floor would provide two science



SOURCE: McArdle Associates Architecture, 2008

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Academy of Our Lady of Peace

Classroom Building Site Plan

FIGURE 3-3

laboratories totaling 2,383 square feet, two vocational studios totaling 4,003 square feet, a 717 square foot teacher lounge/office, restroom facilities and storage.

Figure 3-4 depicts the proposed classroom building exterior elevations.

3.4.2 Access and Parking (Parking Structure)

The proposed project would continue to take access from Copley Avenue, Oregon Street, and Collier Avenue. Because the existing surface parking lot located along Collier Avenue would be removed and replaced with the classroom building, there would not be direct vehicular access into the property off of Collier Avenue. Access into, and out of, the parking structure would be taken off of Copley Avenue. Since the Fall of 2007, measures have been implemented by the Academy in order to facilitate vehicular flow during morning drop-offs and afternoon pickups. Such measures include a designated student pick-up/drop-off location (Figure 5.10-8) and the use of traffic monitors to guide vehicles and limit vehicles exiting the parking lots to turn one way towards the flow of traffic rather than against it during drop-off and pick-up hours. In addition, there is an existing CUP condition for Circle Drive to be open for one-way traffic. Currently Circle Drive is open per an Administrative Enforcement Order dated September 18, 2007. However, the proposed CUP Amendment proposes to close Circle Drive. The traffic study recommends that Circle Drive be closed due to the potential conflict with traffic flow trying to access or depart from the new proposed parking structure. The vehicle flow is described in more detail in EIR Section 5.10 Transportation/Circulation/Parking.

The project proposes a two-level, 94-space parking structure along Copley Avenue, at the northeastern corner of campus. This includes the eight existing surface parking spaces that would continue to be provided adjacent to St. Catherine's Hall. The parking structure would comprise 49,358 square feet. Figure 3-5 depicts the proposed parking structure site plan. Figure 3-6 depicts the proposed parking structure elevations and sections. The parking structure would consist of one subterranean level (level one) and one at-grade level (level two). Therefore, the height of the structure would be minimized at this location. Adjacent to Copley Avenue, the structure would be primarily six feet in height (viewed as a block wall) for 170 lineal feet of frontage, with the exception of the portion of the structure at the corner of Uvada Place and Copley Avenue, which would include an architectural feature of the structure (tower element with tile roof) that would be 17'6 7/8" in height. At the northwest corner of the structure, the height would be 15'7".

The egress/ingress would be provided on level one via Copley Avenue. The back (north side) of the structure would be situated along the canyon ridge and would be open to the canyon to create a Naturally Vented ("Passive") Structure. An elevator would be provided at the northwestern corner of the structure. Table 3-3 provides a parking summary for the proposed project. In addition, the project is requesting a deviation of the setback requirement on Copley Avenue from the required 10-feet to 8-feet. This deviation would allow the project to renovate the existing street frontage landscaping for the entire campus. In addition, the deviation is requested in order to allow the continuity with the existing campus wall. The new decorative screen wall for the parking structure would match the existing, decorative campus walls.

TABLE 3-3
Proposed Project Parking Summary

	Per Municipal Code				
Class	Number	Classrooms	Rate	Parking	Transit Overlay X 0.85
Freshman	210	7	2/class	14	12
Sophomore/ Junior/Senior	*540*	*N/A*	*1/5 students*	*108*	*92*
TOTAL				**122**	**104**

Source: Urban Systems Associates, Inc., 2008.

As shown in Tables 3-3 and 3-4, the proposed project parking structure would provide a total of 94 parking spaces for the Academy; whereas, a total of 104 spaces is required per the City's Municipal code. Therefore, as proposed, within the two-level structure, there would be a 10-space or 9.6 percent parking deficit based on Code requirements.

TABLE 3-4
Existing and Proposed Parking

Location	Existing Spaces	Proposed Spaces	Change
Classroom Building Lot "A"	Existing 21 spaces	Proposed – 0 spaces	-21 spaces
Parking Structure and Surface Parking Lot "B"	Existing 38 spaces	Proposed – 94 spaces	+56 spaces
TOTAL EXISTING ON-SITE	***59 Spaces***		**94**
TOTAL PROPOSED ON-SITE PARKING		**94 Spaces**	**91 Spaces (35 space increase)**

Source: McArdle Associates Architects, Inc., 2008

Also, in order to construct proposed landscaping improvements and the proposed classroom and parking structure, two existing on-street parking spaces would be removed in front of the Academy on Oregon Street. The City has also requested that five existing on-street parking spaces be removed from Collier Avenue, although this is not specifically a result of the project (these spaces were incorrectly striped). Table 3-5 provides a tabulation of the on-street parking proposed to be removed. The designated drop-off/pick-up area on Copley Avenue and three parking spaces located in this area would remain.

TABLE 3-5
On-Street Parking to Be Removed

On-Street Parking	Existing	Proposed	Net Gain/Loss
Copley Street	*8 spaces*	*8 spaces*	*- 0 spaces*
Collier Avenue	21 spaces	16 spaces	- 5 spaces
Oregon Street	26 spaces	24 spaces	- 2 spaces
TOTAL REMOVED			**-7 spaces**

Source: McArdle Associates Architects, Inc., 2008

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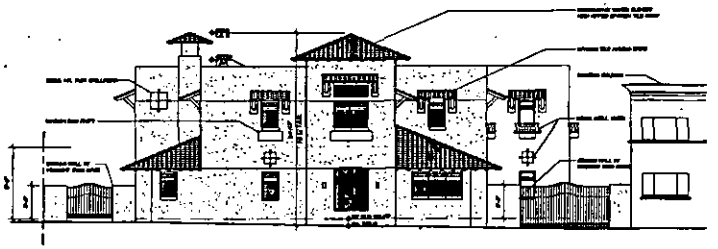
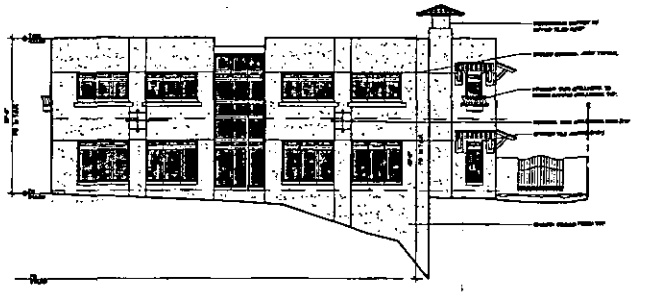
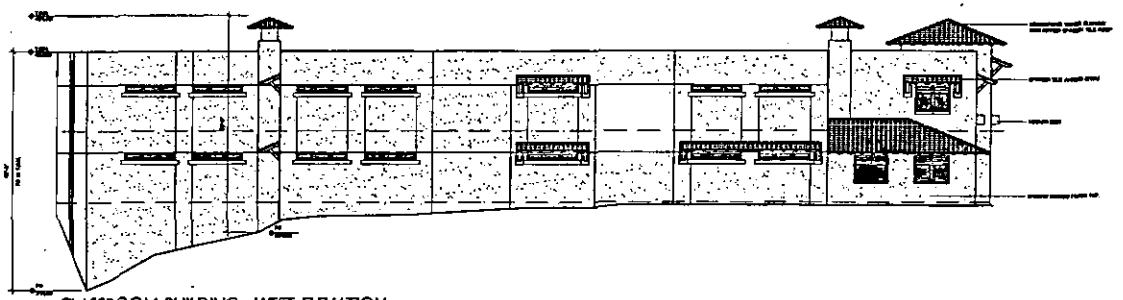


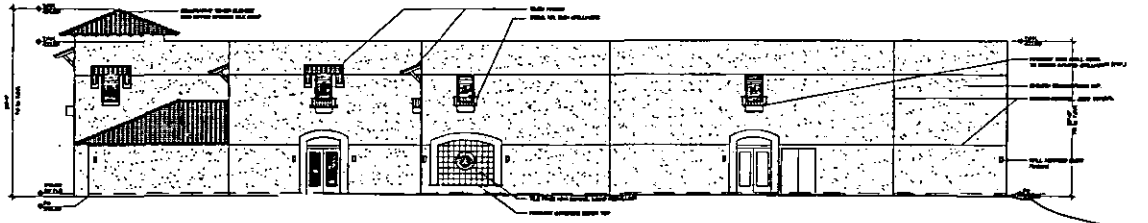
1 CLASSROOM BUILDING - SOUTH ELEVATION



2 CLASSROOM BUILDING - NORTH ELEVATION



3 CLASSROOM BUILDING - WEST ELEVATION



4 CLASSROOM BUILDING - EAST ELEVATION

SOURCE: McArdle Associates Architecture, 2008

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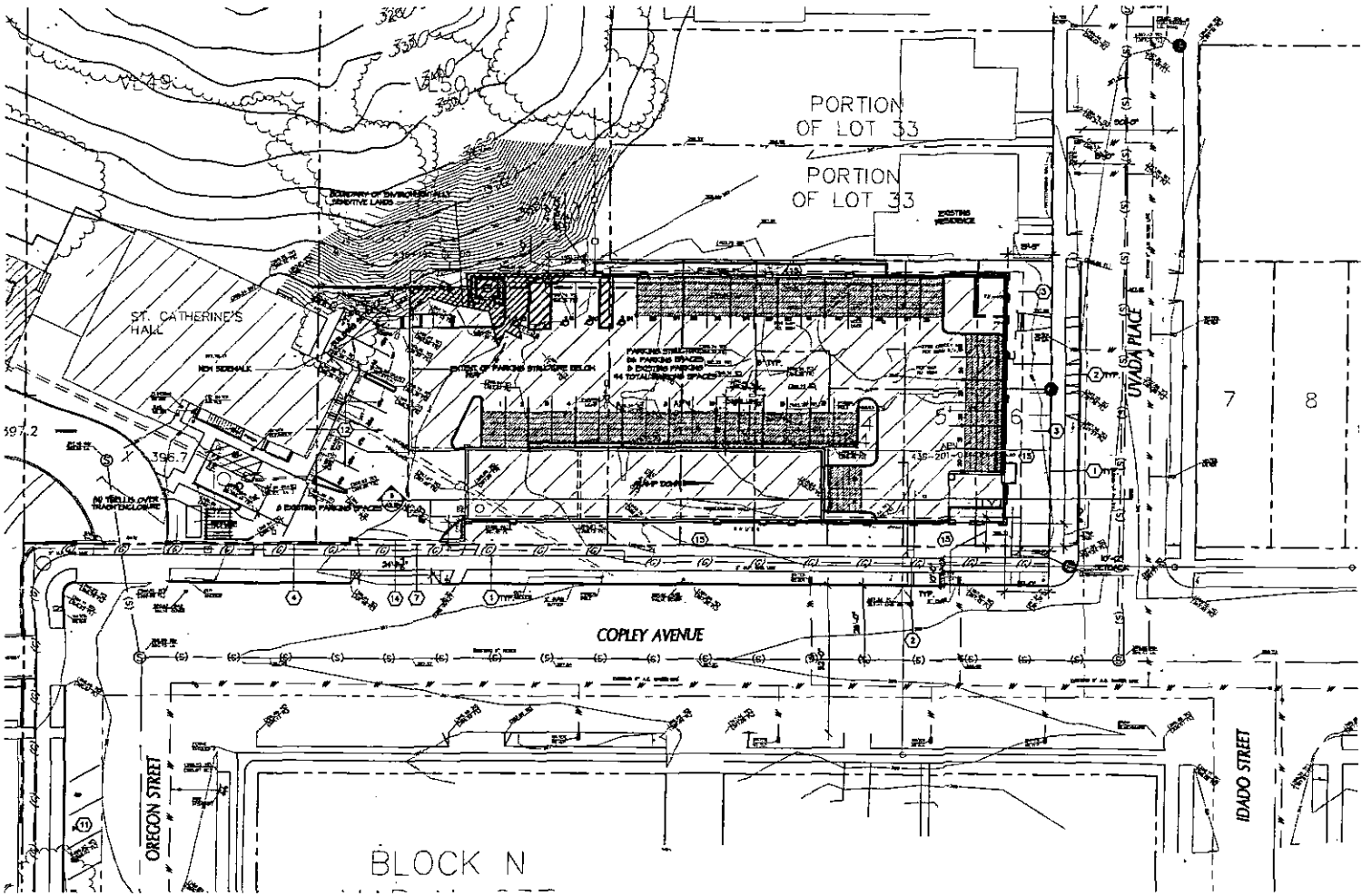
Classroom Building Exterior Elevations

FIGURE 3-4

F:\Projects\635 Academy Our Lady of Peace\3rd Screencheck EIR\Chapter 3\Figure 3-4 Classroom Building Exterior Elevations.ai



SOURCE: McArdle Associates Architecture, 2008

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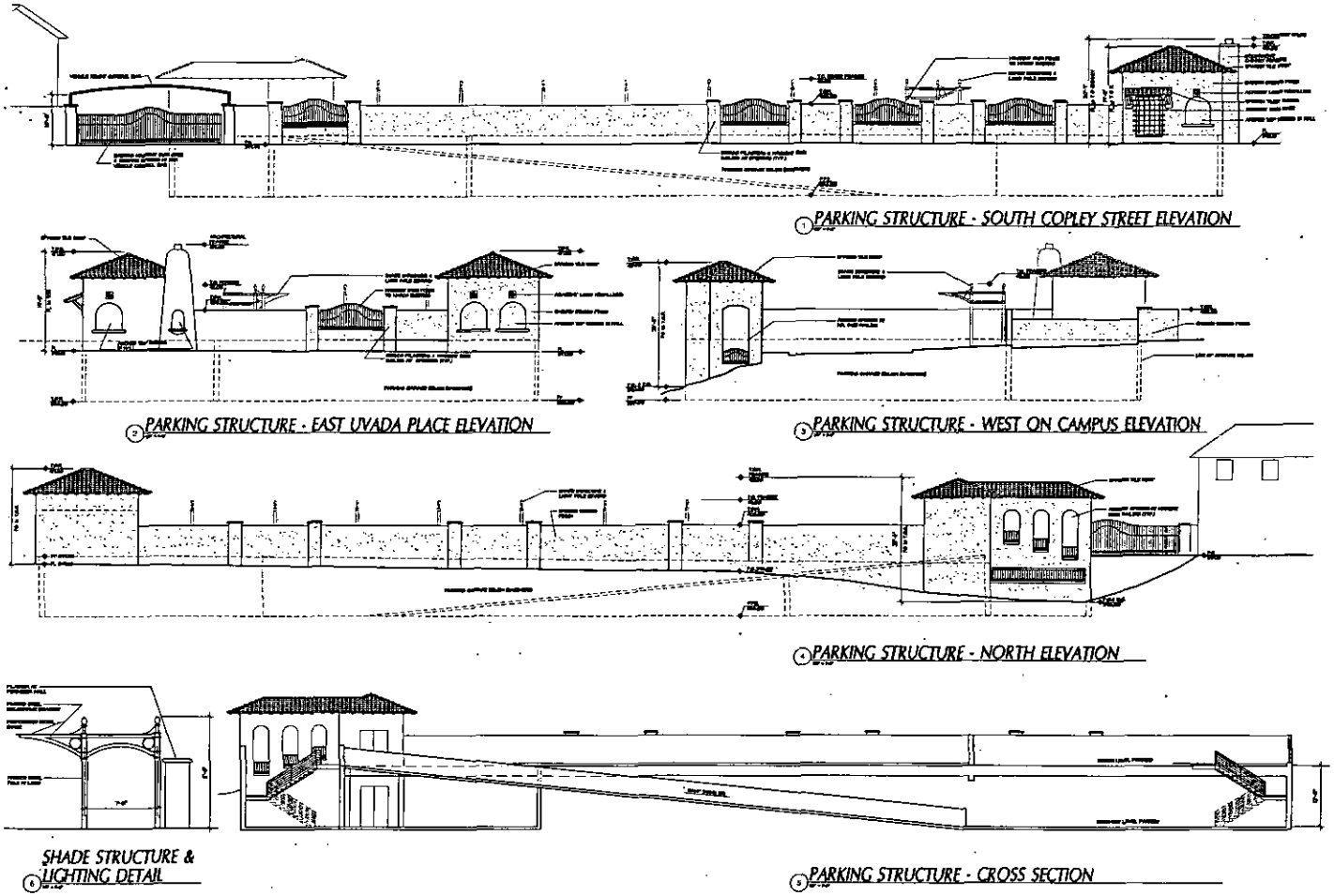
Academy of Our Lady of Peace

Parking Structure Site Plan

FIGURE
3-5



SOURCE: McArdle Associates Architecture, 2008

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Academy of Our Lady of Peace

Parking Structure Elevations and Sections

FIGURE 3-6

F:\projects\635 Academy Our Lady of Peace\3rd ScreenCheck EIR\Chapter 3\Figure 3-6 Parking Structure Elevations and Sections.ai

3.4.3 Landscaping Renovations

The proposed project would also include the renovation of the existing street frontage landscaping for the entire campus as well as landscape renovation of the Point and the Meditation Garden areas. Existing trees on the project site and located in the public right-of-way immediately adjacent to the Academy are proposed to be removed in order to construct the classroom building, parking structure, and a make proposed street and sidewalk landscape improvements. The landscaping at the Point and Meditation Garden will be renovated within the existing foot-print with non-invasive species.

3.4.3.1 Frontage/Streetscape

The proposed landscape concept plan would provide a formalized planting for the administration building, with mature palms flanking the entry plaza to enhance the sense of entry and secondary palms for the remainder of the streetscape to create a more open visibility to the main entry. Vines and accent shrubs would provide an ornamental foundation planting along the walls and wheelchair access ramp. Landscaping is proposed for the remainder of the frontage streetscape that would recreate an historic streetscape using a plant palette appropriate to the history and style of the school as well as the surrounding local context. Primary tree plantings include fruitless olive tree, Chinese elm, Chinese flame tree, broad feather palms, feather palms, and fan palms. .

New curbs and gutters would be provided along the street frontage (Collier, Oregon, and Copley).

3.4.3.2 Brush Management/Fuel Modification

The project site is located in a Fire Hazard Overlay Zone; therefore, the project is subject to brush management zone requirements. The project would provide a 35-foot wide Zone 1 fuel/brush management zone around the rear of the campus buildings abutting the natural canyon/open space to the north. Also, the project would provide a 65-foot wide Zone 2 fuel/brush management zone beyond the defined Zone 1 area. A fuel/brush management zone has already been implemented around the site per the existing CUP, and the new proposed zones would overlap to a large degree with these zones.

The criteria for the proposed zones are as follows:

Zone 1: Existing landscape shall have an average maximum mature height of 24" or less, or would be maintained at 24" or less. This zone must be irrigated regularly, consist of mostly ornamental vegetation with no more than 10% native or naturalized vegetation, and trees and large shrubs must be pruned away from structures and roofs.

Zone 2: Individual non-irrigated plant groupings over 18" in height may be retained, provided they do not exceed 400 square feet in area and their combined coverage does not exceed 30% of the total Zone-2 area. Shrubs in new planting areas (if needed) shall have an average maximum mature height of 24" or less, or would be maintained at 24" or less. This zone can not have permanent irrigation, and must be thinned and pruned regularly to reduce vegetation by 50% without harming native plants, animals, soils or habitats.

Both Zones: 50%-70% of the area shall be planted (if needed) with deep-rooting, spreading vines and prostrate shrubs with low fuel volume and low to moderate fire retardance.

3.4.4 Utility Improvements

3.4.4.1 Sewer

Sewer infrastructure is currently located in the streets adjacent to the project site. An existing six-inch sewer line is located within the existing Collier Avenue right-of-way, immediately south of the proposed classroom building site. In addition, an existing sewer line is located on the Academy's campus, west of the proposed parking structure and south of St. Catherine's Hall. This sewer line flows in a southern direction to an existing six-inch sewer line that is located within the Oregon Street and Copley Avenue right-of-ways.

In addition, site runoff and drainage for the proposed project is discussed in Section 5.5 Hydrology/Water Quality of this EIR.

3.4.4.2 Water

Domestic water service for the new buildings would be provided via existing six-inch water lines located adjacent to the project site in the Collier Avenue and Copley Avenue public right-of-ways. The proposed project would tie into these existing facilities. An upgraded fire hydrant that would connect to the water main in Copley Avenue would be installed near the Copley Avenue and Oregon Street intersection and would remove the existing fire hydrant located on Oregon Street located near the intersection of Oregon Street and Copley Avenue. In addition, to this fire hydrant, sprinklers would be installed in both the classroom building and parking structure, and a stand pipe would be provided at the parking garage.

3.4.4.3 Gas and Electric

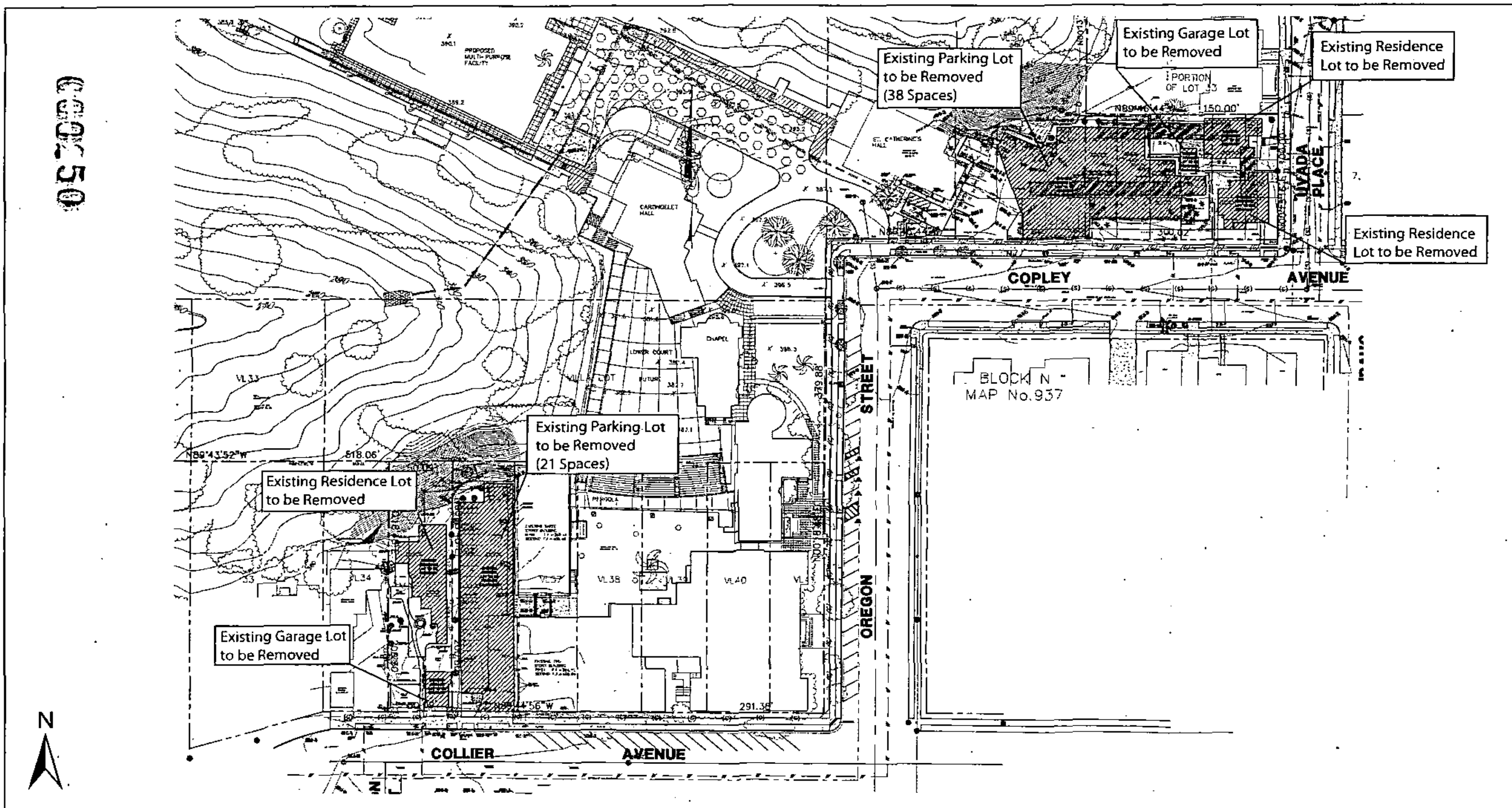
Gas and electric power is currently provided to the project site by San Diego Gas and Electric (SDG&E). Gas and electric lines from the proposed new structures would connect with existing infrastructure within the project site. The project does not propose any significant changes in the existing gas and electric infrastructure.

3.4.5 Demolition

The proposed project would involve the demolition of three single-family structures owned by the Academy, on the project site as follows:

- 2544 Collier Avenue
- 2746 Copley Avenue
- 4910 Uvada Place

Figure 3-7 depicts the proposed demolition plan. The proposed classroom building would require the demolition and removal of a single-family structure and associated garage owned by the Academy at 2544 Collier Avenue. Also, the existing 21-space surface parking lot would be removed.



SOURCE: McArdle Associates Architecture, 2008

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Academy of Our Lady of Peace

Demolition Plan

FIGURE 3-7

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The proposed parking structure would require the demolition and removal of two single-family structures, and one garage associated with a single-family structure, currently owned by the Academy. The structures are contiguous and located at 2746 Copley Avenue and 4910 Uvada Place. Also, the existing 38-space surface parking lot would be removed, although 8 spaces would remain in its current configuration adjacent to St. Catherine's.

The existing on campus parking lot wall would be removed, and at the classroom building and parking structure locations and existing curb, sidewalk and gutter would be removed.

3.4.6 Grading and Construction Activities

3.4.6.1 *Grading*

The proposed project would result in grading of approximately 0.96 acres of land. The grading estimates are provided in Table 3-6 below. Approximately 7,330 cubic yards of material would be exported from the project site to a City approved location.

TABLE 3-6
Estimated Grading Quantities

	Classroom Building	Parking Structure	Total
Graded Area (square feet)	0.42	0.54	0.96 sq. ft.
Cut Quantities (cubic yards)	3	7355	7358 cy
Fill Quantities (cubic yards)	985	25	1100 cy
Import (cubic yards)	982	0	982 cy
Export (cubic yards)	0	7330	7330 cy

Notes: cy = cubic yards
sq. ft. = square feet
Source: Civil Consulting Group, Inc., 2007.

3.4.6.2 *Construction*

Construction is planned to occur in separate phases. The parking structure would be constructed first followed by the classroom building. In any event, construction of each structure is expected to last approximately 9-12 months.

3.4.7 Proposed Uses/Operational Characteristics

The primary operational change that would occur under the CUP amendment is to officially recognize a maximum student enrollment of 750 students. These limits would be memorialized in the CUP amendment; however, it should be noted that the existing student enrollment is currently 750. AOLP's school year begins the Monday before Labor Day and runs to the first week of June. Generally, the campus is open to students between 7am and 7pm and the school's class hours are Monday to Thursday 7:45 AM to 2:15 PM and Friday 7:45 AM to 12:45 PM. During finals (one week in January and one week in June) the hours are 8:00 AM to 11:45 AM. The school takes a two-week holiday at Christmas and a week to 10 days for Easter. Operations of the school are not expected between the hours of 10:00 p.m. and 7:00 a.m.

AOLP also provides two summer school sessions. A one-week session is held in June and a six-week session is held in June and July. Class hours for summer school are 8:00 AM to 12:00 PM.

Special events associated with the normal school functions are also held throughout the year. These events include, and are not limited to, a variety of activities ranging from information nights for sports activities, class reunions, back-to-school nights, open house, workshops, plays/performances, academic advisory nights, and graduation.

Otherwise, operational characteristics would remain similar as occurs today.

3.5 Summary of Deviations and Discretionary Actions Required

Construction and operation of the proposed project would require the following discretionary approvals by the City of San Diego. The project includes a Process 4 approval and therefore would be considered by the City Planning Commission.

1. **Amendment to Conditional Use Permit (CUP/RPO No. 92-0769).** The proposed project site is located within the RS-1-7 and RS-1-1 zones and a per §126.0303 a Conditional Use Permit (CUP) is required for the educational facilities. An education institution is allowed in these zones with approval of a CUP. The proposed project would amend the existing CUP/RPO No. 92-0769 to accommodate the proposed project.

2. **Site Development Permit.** A Site Development Permit (SDP) is required for development proposed in areas governed by the City's Environmentally Sensitive Lands (ESL) regulations. Per §143.0110, Table 143.01A, SDP Process 3 is required for non-residential development where steep slopes are present on the premises. With respect to the proposed project, applicable ESL regulations are steep hillsides §143.0110 (sites containing slopes with a gradient of at least 25% or greater) and sensitive biological resources §143.0141. The decision making body to approve the Site Development Permit would be the City of San Diego Planning Commission in accordance with Process Three of the City's Municipal Code.

3. **Planned Development Permit.** The applicant for the proposed project is requesting the approval of deviations from the applicable development regulations in accordance with §126.0602(b) of the City's Municipal Code, pursuant to a Planned Development Permit. Per §126.0602(b)(1) required parking, height, and side yard setback deviations because development does not comply with all the base zone regulations or all development regulations. The decision making body to approve the Planned Development Permit would be the City of San Diego Planning Commission in accordance with Process Four of the City's Municipal Code, provided that the findings in §126.0504(a) and the supplemental findings in §126.0504(b) are made.

The following are deviations proposed:

Height Deviation. A height deviation for the proposed 2-story classroom building. The development criteria for the underlying single-family zone allows a maximum height of 30 feet measured from the

adjacent grade. The proposed new classroom building would achieve a height of 43 feet 6 inches (elevation 422.5 feet), as measured from the northern side of the building at its lowest point in the canyon. The street grade height (adjacent to Collier Street) would be consistent with the 30-foot height limit for the zone except for the tower element and two chimneys.

The proposed classroom building height deviation would occur at three locations: 1) at the far northwest corner of the project on the slope, below street level. 94.8% of the building complies with the height limitation. 4.2% of the building exceeds the limitation by 13'6". The portion of the building exceeding the limitation is not visible from the street, or any public lands, and does not disrupt views from any public or private lands. The street façade features a decorative tower element with a height of 35'11" (elevation 429 feet) at the peak of its hipped roof. This element represents approximately 3.3 percent of the overall building footprint area. 2) Along the west elevation, the classroom building would be consistent with the 30-foot height limit with the exception of two decorative chimney elements, each 64 square feet in size. The chimney feature on the southern end of the west elevation exceeds the height limit by approximately 4 feet 7 inches (elevation 429 feet) and represents approximately 0.57% of the building footprint.

3) The chimney element on the northern end of the west elevation is also 64 square feet in size. It exceeds the height limit by approximately 9 feet 6 inches (elevation 429 feet) and represents approximately 0.57% of the building footprint.

Due to PDP requirement, the limited percentage of building area affected, lack of street frontage visibility, and addition of Spanish Eclectic features sympathetic to the neighborhood, none of the 3 height deviation areas were determined to be significant CEQA impacts.

Parking Deviation. The required parking for the project is 104 spaces. The project proposes to provide a total of 94 spaces in a two-level parking structure (one level below grade and one level at grade) surface and parking. Therefore, as proposed, the project would provide 10 spaces less than the amount required for the project. As proposed, within the two-level structure, there would be a 10-space or 9.6 percent parking deficit based on Code requirements. Chapter 9 Alternatives, provides a discussion of potential alternatives that would avoid this potential significant impact.

Setback Deviation. The required building setback (Street Side Setback) along Copley Avenue is 10 feet. The project proposes to reduce this setback from the 10-foot Street Side Setback requirement to 8 feet on Copley Avenue. The new decorative screen wall for the parking structure would match the existing, decorative campus wall which already has an 8-foot setback along this street. The proposed 2-foot deviation, therefore, would allow continuity with the existing campus decorative wall along Copley Avenue and provide landscaping renovations which would further enhance the streetscape. Due to the PDP requirement to obtain this deviation and the consistency of the deviation with existing setbacks along the street frontage, this deviation has not been determined to constitute a significant impact under CEQA.

In addition to the discretionary actions identified above, construction of the proposed project would require the following City-issued permits: 1) grading permit; 2) demolition permit; and, 3) building permit. A neighborhood development permit would be required for an alternative parking configuration within the project site that involves tandem parking. A neighborhood development permit is non-discretionary (Process 2 Pursuant to §126.0403 of the City's Municipal Code). It is currently not anticipated that other local, state, or federal approvals would be required for project implementation. The project has been reviewed by the Federal Aviation Administration (FAA); and, the FAA has determined the project not to be a hazard to air navigation.

4.0 HISTORY OF PROJECT CHANGES

The following summarizes the changes to the project that have been incorporated by the Applicant in response to issues and concerns identified by the community and City of San Diego. These modifications have been made both prior to submittal of a formal application to the City, as well as during City development review of the project.

4.1 Building Design

The City's Long Range Planning Department commented that the Guidelines within the Urban Design Element provide that bulk should be controlled through the use of vertical and horizontal offsets. The applicant should consider upper-story offsets along the eastern, western and southern elevations for the proposed classroom to diminish the bulk of the proposed facades along those elevations.

In response to these comments, the following has been incorporated into the project to address these issues of urban design:

1. **Character & Scale:** *Regarding character & scale, the classroom building facade is articulated with banding, pilasters, recessed windows, and awnings similar to the character of the neighborhood residential architecture. A rendering of the classroom building is provided in EIR Figure 5.1-5.*

2. **Bulk:** *Regarding bulk, the classroom building has been redesigned to eliminate the domed roof on western side of building. Additional changes include incorporating the requested upper story offsets along the street façade and the west elevations.*

3. **Existing Residences/Character Scale:** *Regarding character and scale, the classroom building has been redesigned to incorporate the requested west façade articulation in the form of building reveals, window patterns, and roof elements. Also, proposed landscaping along the west elevation has been enhanced as well. Furthermore, working with the various community groups during the conceptual design phase has revealed a few key issues worthy of addressing. Regarding project design, the primary concerns were: minimizing building mass, sensitivity to the neighborhood architectural vernacular, and preserving or restoring existing building character. In response to community input, the proposed classroom building and parking facility have been recently further redesigned in the Spanish eclectic style featuring red tile roofs, white stucco, window awnings, wrought iron accents, arched openings, simple step-back massing, window boxes, and simple window forms. The redesigned buildings mirror the Spanish eclectic elements of the existing residences that would be demolished with implementation of the proposed project. Figures 5.4-1 through 5.4-3 of this EIR provide photos of the existing design of the residences. Figures 5.1-5 and 5.1-7 depict the design of the proposed classroom building and parking facility, which have incorporated some design features of the Spanish eclectic elements of the residencies.*

Additionally, the City's Long Range Planning Department commented that the western elevation, which directly faces the existing residences to the west, should provide additional surface articulation in the form of varying textures, colors, building materials, and landscaping.

In response to these comments, the following has been incorporated into the project to address these issues of urban design:

1. *The classroom building (Project A) has been redesigned to incorporate the requested west façade articulation in the form of building reveals, window patterns, and roof elements. The landscaping along the west elevation has been enhanced as well.*

Furthermore, given the location of the proposed parking facility along Copley Avenue, measures to screen the structure or to enhance the proposed wall facades (northern, southern, and eastern elevations) – especially the northern elevation which abuts existing single family development is highly encouraged.

In response to these comments, the following has been incorporated into the project to address these issues of urban design:

1. *Parking Structure façade enhancements along Copley Avenue and Uvada Place originally included repetitive decorative pilasters matching the existing campus perimeter walls, decorative blue wrought iron inserts and gate matching the campus iron work motifs, and a red clay tile roof corner element reflecting the architectural character of the neighborhood as well as of the campus. Additionally, the walls are screened with enhanced landscaping, including trees, shrubs, and flowers. Elevations of the proposed 2-level parking structure are provided in Figure 5.1-7, and the alternative 3-level structure are provided in Figures 9.1-1 and 9.1-2 in Section 9.0 Alternatives of this EIR. Furthermore, the proposed parking facility has recently been further redesigned in the Spanish eclectic style featuring red tile roofs, white stucco, window awnings, wrought iron accents, arched openings, simple step-back massing, window boxes, and simple window forms. The redesigned structure mirrors the Spanis eclectic h elements of the existing residences that would be demolished with implementation of the proposed project.*

4.2 Landscaping

In response to City landscape review comments, the proposed planting on the parking deck has been deleted and replaced with a shade trellis. The trellis on the upper level of the parking structure would *consist of a series of decorative metal poles with articulated brackets.*

Additionally, the Landscape Standards of the Land Development Manual (SDMC §142.0403) does not permit the planting of invasive species. Therefore, *Ulmas parvifolia, Vinca and Carprobrotus have been removed from the plant legend. However, Washingtonia robusta and Phoenix canariensis exist on and off-site. These plant species have been selected to fit into the character of the local neighborhood.*

4.3 Parking

The parking requirement for the proposed project, as calculated by the Applicant, indicated the need for a 128-space parking structure in order to meet City requirements. As such, a three level parking structure, providing 128-parking spaces was designed (see Section 9.0 Alternatives). However, the parking requirements were subsequently recalculated as part of the traffic analysis for the proposed project, and it was determined that 104 spaces was required. This revised calculation is based, in part, by the project's location within a Transit Overlay Zone.

The initial permit application submitted to the City for review included both the 3-level, 128-space parking structure, and a 2-level, 91-space structure (proposed in response to community input that on-street parking was not an issue and a smaller scale parking structure was preferred). This 91-space structure would have been deficient in the amount of required parking by 12.5%. The City's Significance Determination Thresholds (January 2007) indicate that, "Generally, if a project is deficient by more than ten percent of the required amount of parking and at least one of the following criteria applies, then a significant impact may result." Also, City staff has indicated that a parking deficit greater than 10% would not be supported. Therefore, the Applicant revised the parking layout of the 2-level parking structure, which included altering the location of structural features, in order to accommodate three additional parking spaces (94 parking spaces would be provided on-site) and decrease the parking deficiency to less than 10% (i.e., 9.6%). This could achieve support by City staff. However, as indicated in Section 5.10 Traffic/Circulation/Parking, the impact is still considered significant, and unmitigable as it is not fully compliant.

4.4 Biological Resources/Habitat Classification

Certain areas of habitat on the project site were originally mapped as "southern mixed chaparral." Based on City staff review of the biological report, the southern mixed chaparral classification was re-classified to southern maritime chaparral based on Attachment I (A)(2) of the *City of San Diego Guidelines for Conducting Biological Surveys* and further direction from Development Services Staff.

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5.1 Aesthetics/Neighborhood Character

5.1.1 Existing Conditions

As discussed in EIR Chapter 2.0, the project is located within a densely urbanized area and is located at the tops of slopes to tributary canyons of Mission Valley. There are no designated scenic highways or designated public scenic vantage points within the project vicinity. Topography of the site has an elevation of approximately 385 feet above mean sea level (amsl) at the level portion and an elevation of 175 amsl in the open space area at the north portion of the site.

5.1.2 Impact Thresholds

The City of San Diego Significance Determination Thresholds outlines the thresholds for determining significance. Impacts to aesthetics/neighborhood character may be considered significant if the project could:

- *Block public views from designated open space areas, roads, or parks or to significant visual landmarks or scenic vistas (Pacific Ocean, downtown skyline, mountains, canyons, waterways);*
- *Severely contrast with the surrounding neighborhood character;*
- *Significantly alter the natural landform;*
- Have a negative visual appearance; and/or,
- *Emit or reflect a significant amount of light or glare.*

5.1.3 Impacts

Issue 1: Would the project result in a substantial change in the topography or ground surface relief features?

5.1.3.1 Land Form Alteration

Development associated with the project would consist of a classroom building and a parking structure. These new structures are proposed in primarily flat areas with existing development, so that any encroachment into the sites steep topography is minimized. The proposed project would involve the demolition of three single-family structures owned by the Academy on the project site. Also, the proposed project would result in grading approximately 0.96 acres of land. Approximately 7,355 cubic yards of cut would be excavated from the site (primarily for the below grade level of the parking structure) and 1,100 cubic yards of fill material would be used.

The classroom building is proposed to be developed on the west side of the existing campus and would include the development on a portion of the steep slopes that is immediately adjacent to the classroom site. However, the proposed project would not disturb the steep hillsides in excess of the encroachment allowances of the Environmentally Sensitive Lands regulations (LDC Chapter 14, Article 3, Division 1). In addition, the proposed project would fill a portion of the slope to accommodate the classroom building.

This would create a small manufactured slope on the northwestern portion of the classroom site, but would not be readily visible from adjacent areas or result in a change in the elevation of the steep hillside. The majority of the project site proposed for new development has been graded and is flat. As such, the project does not propose mass terracing of natural slopes.

Therefore, the proposed project would not result in a substantial change in the topography or ground surface relief features and no significant impact would occur.

Issue 2: Would the proposed project block public views from designated open space areas, roads, parks or to any significant visual landmarks or scenic vistas?

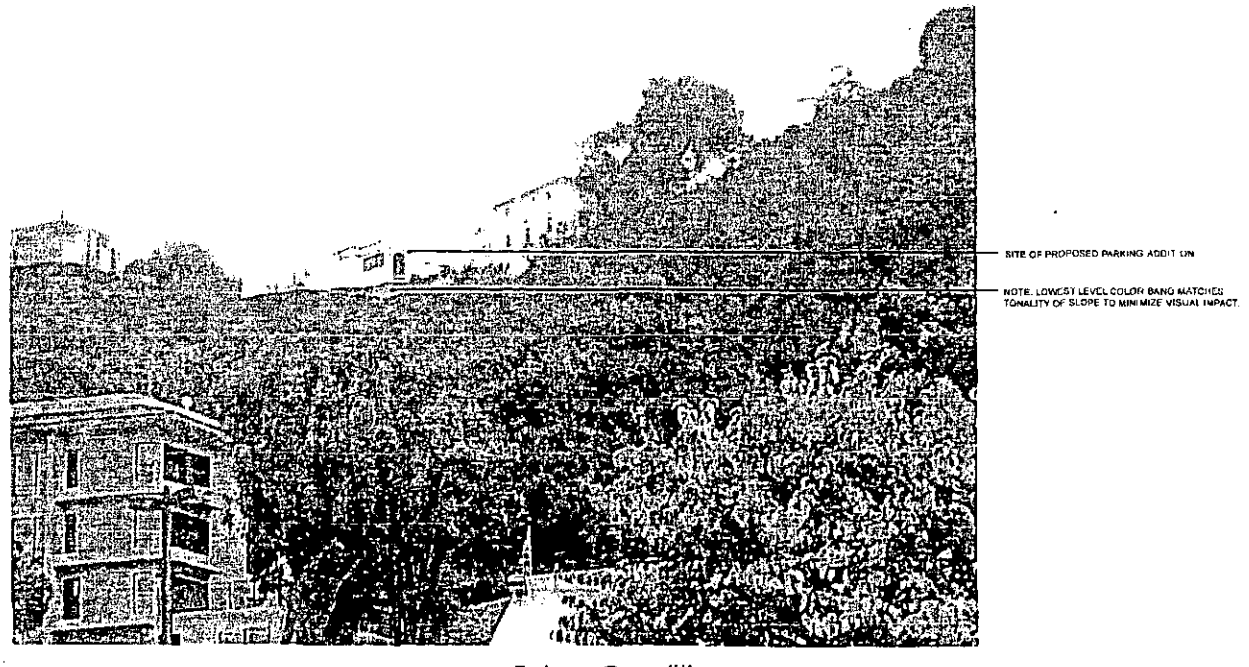
5.1.3.2 Views

The Greater North Park Community Plan Urban Design Guidelines (1986, page 109) includes measures to protect public views of Greater North Park's natural scenic amenities, especially Mission Valley, Balboa Park and the Switzer and 32nd Street canyons. The developed Academy Campus is located along the edge of steep slopes and views of Mission Valley are available from areas throughout the campus. The existing buildings on the Academy's campus block views of the valley from portions of Oregon Street, Collier Avenue, and Copley Street. The buildings include the three residential structures proposed to be demolished, as well as the existing block wall that encloses the parking lot located along Copley Avenue. Therefore, the proposed project would not impact a public view corridor to the valley. The proposed project may further obstruct the views of the valley from nearby residences; however, residential units are not considered a public resource and the City of San Diego regulations do not protect private views.

Portions of the northern side of the Academy's campus are visible at a distance from vehicles traveling along portions of Texas Street and Interstate 8 (I-8). Vehicles traveling along Texas Street and I-8 currently have a view of portions of the existing campus. Figure 5.1-1, provides a view of the proposed two-level parking structure from the bottom of the slope, adjacent to I-8, looking up to the campus. Based on this view the new parking structure would be visible from portions of Texas Street and I-8. Figure 5.1-2 provides a view of the location of the proposed classroom building from Texas Street. Due to the intervening topography of the steep slopes and canyon surrounding the campus, the new classroom building would not be readily visible from Texas Street or I-8. Figure 5.1-3 provides a view of the proposed classroom building; however, this view was taken from an internal location to the campus and would not be readily visible from any public street. As such, the proposed parking structure would be the only building that would be visible from vehicles traveling along Texas Street I-8. As part of the Site Development Permit review, the City has required that the lowest color match to tonality of the slope, as is depicted in Figures 5.1-1 and 5.1-3. Mitigation Measure ANC-1 is proposed to ensure the potential aesthetic impact is reduced to a level less than significant.

As part of the proposed project, the proposed classroom building would be constructed at a height greater than allowed by the development criteria for the underlying single-family zone, which allows a maximum height of 30 feet. Therefore, the proposed project would require the approval of a height deviation. The proposed classroom height deviation occurs at the far northwest corner of the project on

Existing Conditions



Future Conditions

SOURCE: McArdle and Associates Architects, 2008

6/4/08

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Visual Simulation - View of Proposed Parking Structure Site at South Slope

FIGURE

5.1-1

[illegible]\Academy of Our Lady of Peace\Chapter 5\Figure 5.1-1 View of Proposed Parking Structure South Slope.ai

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SOURCE: McArdle and Associates Architects, 2008

5/5/08

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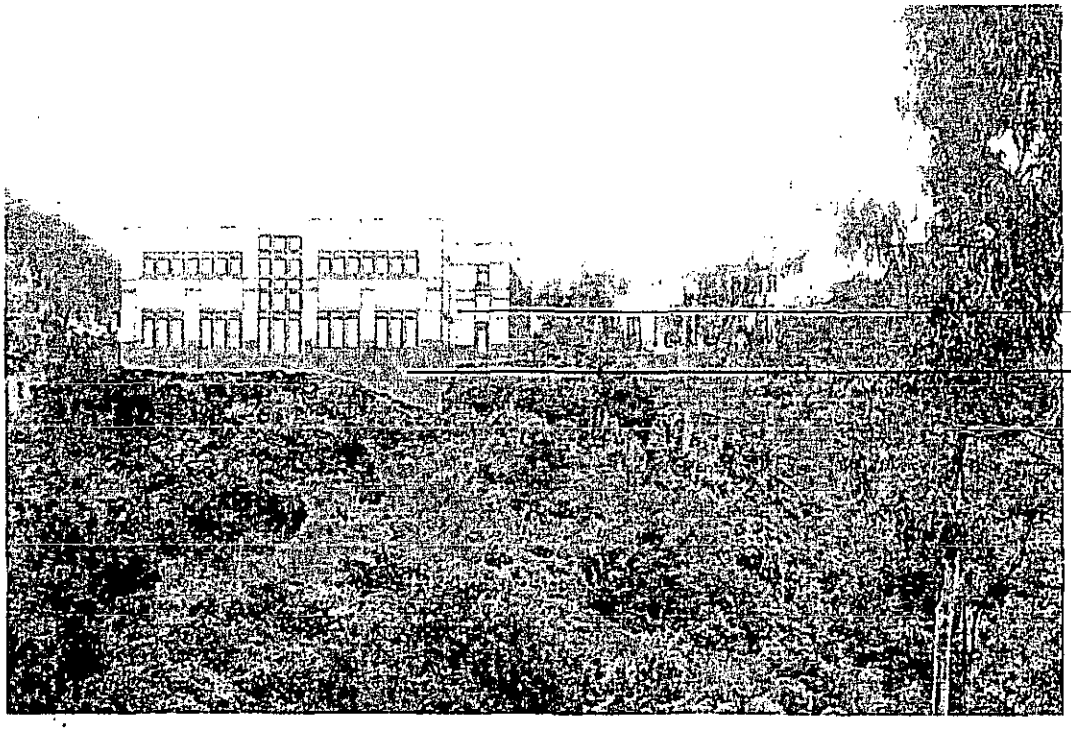
Visual Simulation - View of Proposed Classroom Site at South Slope from Texas Street

FIGURE 5.1-2

F:\projects\635 Academy of Our Lady of Peace\Chapter 5\Figure 5.1-2 View of Proposed Classroom o[illegible]h Slope.ai

Existing Conditions



Future Conditions

SOURCE: McArdle and Associates Architects, 2008

6/24/08

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Visual Simulation - View of Proposed Classroom Building Site at South Slope from an Internal Location of the Academy's Campus

FIGURE 5.1-3

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the slope, below street level. All of the 11,123 square foot footprint of the proposed two-story classroom building would sit on the flat portion of this site, except a 470 square foot portion on the far northwest corner where the site extends slightly past the edge of the slope. This portion represents approximately 4.2% of the building footprint. The proposed classroom building complies with the district height restrictions with the exception of the following two conditions (a total deviation of 7.5%):

- Approximately 4.2% of the building extends slightly past the edge of slope, resulting in a retaining wall down to grade. This retaining wall, not visible from neighboring properties, follows the existing contours of the site, as a wedge shape extending approximately 13 feet 6 inches below finish floor at the lowest corner.

- The proposed classroom building's Collier Street frontage, west elevation and east elevation would be consistent with the 30-foot height limit with the exception of the tower element and two decorative chimneys.

  — The classroom building would be 29 feet 6 inches in height (elevation 422.5 feet) adjacent to Collier Street (south elevation). However, the proposed 367 square foot tower architectural feature would be 35 feet 11 inches in height (elevation 429 feet). This element represents approximately 3.3% of the building footprint.

  Along the west elevation, the classroom building would be consistent with the 30-foot height limit with the exception of two decorative chimney elements, each 64 square feet in size. The chimney feature on the southern end of the west elevation exceeds the height limit by approximately 4 feet 7 inches (elevation 429 feet) and represents approximately 0.57% of the building footprint.

  The chimney element on the northern end of the west elevation is also 64 square feet in size. It exceeds the height limit by approximately 9 feet 6 inches (elevation 429 feet) and represents approximately 0.57% of the building footprint.

  These three decorative features reflect neighborhood architectural vernacular and are consistent with the campus and the surrounding neighborhood Spanish Eclectic residential aesthetic.

As viewed from the street and side yards, the proposed classroom building is below the required 30 ft height restriction with the exception of the decorative tower element and chimneys. The remaining portion of the building exceeding the limitation (the northwest corner) is not readily visible or prominent from the adjacent residential or public streets or any public lands. As depicted on Figure 5.1-3, the height deviation does not result in a disruption of views from any public or private viewing areas.

Therefore, the proposed project would not block public views from designated open space areas, roads, parks or to any significant visual landmarks or scenic vistas and no significant impact would occur.

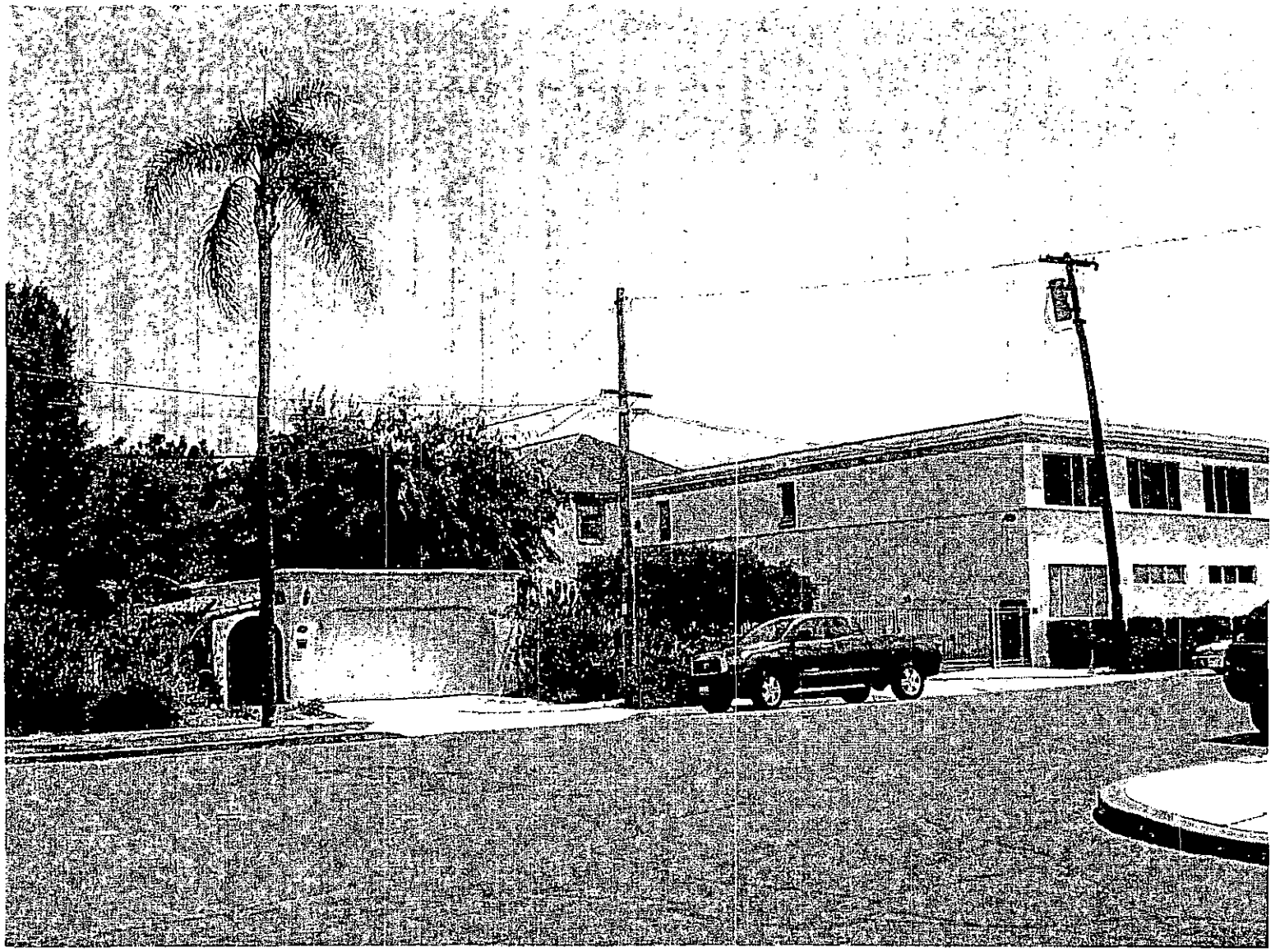
Issue 3: Would the project affect the existing visual character of the site and surrounding area, particularly with respect to views from any major roadways and public viewing areas?

5.1.3.3 Neighborhood Character/Architecture

The proposed project includes the development of a new classroom building and parking structure. The exterior of the new classroom building, including walls, roof and architectural treatments, would complement the materials, color palette, and design character of the neighborhood. The exterior walls would be a white color, which is consistent with the color of the existing campus buildings. Figures 5.1-4 depicts the existing conditions view of the proposed classroom building site, and Figure 5.1-5 depicts the view of the southern side of the classroom building as proposed, from a viewpoint along Collier Avenue.

The parking structure is a two-level parking structure that would include walls and architectural treatments, which would also complement the materials, color palette, and design character of the neighborhood. The exterior walls would be a white color and would include wrought iron fencing to match the existing campus. Architectural elements of the residents to be demolished would be incorporated into the design. The parking structure would consist of one subterranean level (level one) and one at-grade level. Figure 5.1-6 depicts the existing conditions of the parking structure site, as viewed from Copley Avenue. Figure 5.1-7 depicts the view of this area with the proposed two-level parking structure. As depicted on Figure 5.1-7, with this design, the surrounding neighborhood would view this structure as an at-grade surface level lot similar to the existing condition that is visible with the surface parking lot and decorative screen wall. An electric room, with a height of approximately 15.5 feet and constructed with painted white stucco and columns to match the existing boundary wall, would be constructed in the southeast corner of the parking structure (corner of Copley Avenue and Uvada Place) (Figure 5.1-7). The proposed parking structure would be in the scale and character of the existing Academy campus and neighborhood, and would not contrast with the surrounding neighborhood character. In addition, as discussed in Section 3.0, the project is requesting a deviation of the setback requirement on Copley Avenue from the required 10 feet to 8 feet associated with the proposed parking structure. This deviation will allow the project to renovate the existing street frontage landscaping for the entire campus. In addition, the deviation is requested in order to allow the continuity with the existing campus wall. The new decorative screen wall for the parking structure will match the existing, decorative campus walls.

As previously discussed, the project would require a height deviation for the proposed classroom building. The proposed classroom height deviation occurs at the far northwest corner of the project on the slope, below street level. The portion of the building exceeding the limitation is not visible from the residential streets, or any public lands, and does not disrupt views from any public or private lands. As depicted in Figure 5.1-2, the classroom building would not be visible from portions of Texas Street and I-8. In addition, as depicted in Figure 5.1-3, the proposed classroom building is designed to blend in with the existing campus architecture and treatment of walls on slopes. Therefore, the proposed project would create a project with bulk, scale, materials, or style, which would be compatible with surrounding development.



SOURCE: McArdle and Associates Architects, 2008

6/27/08

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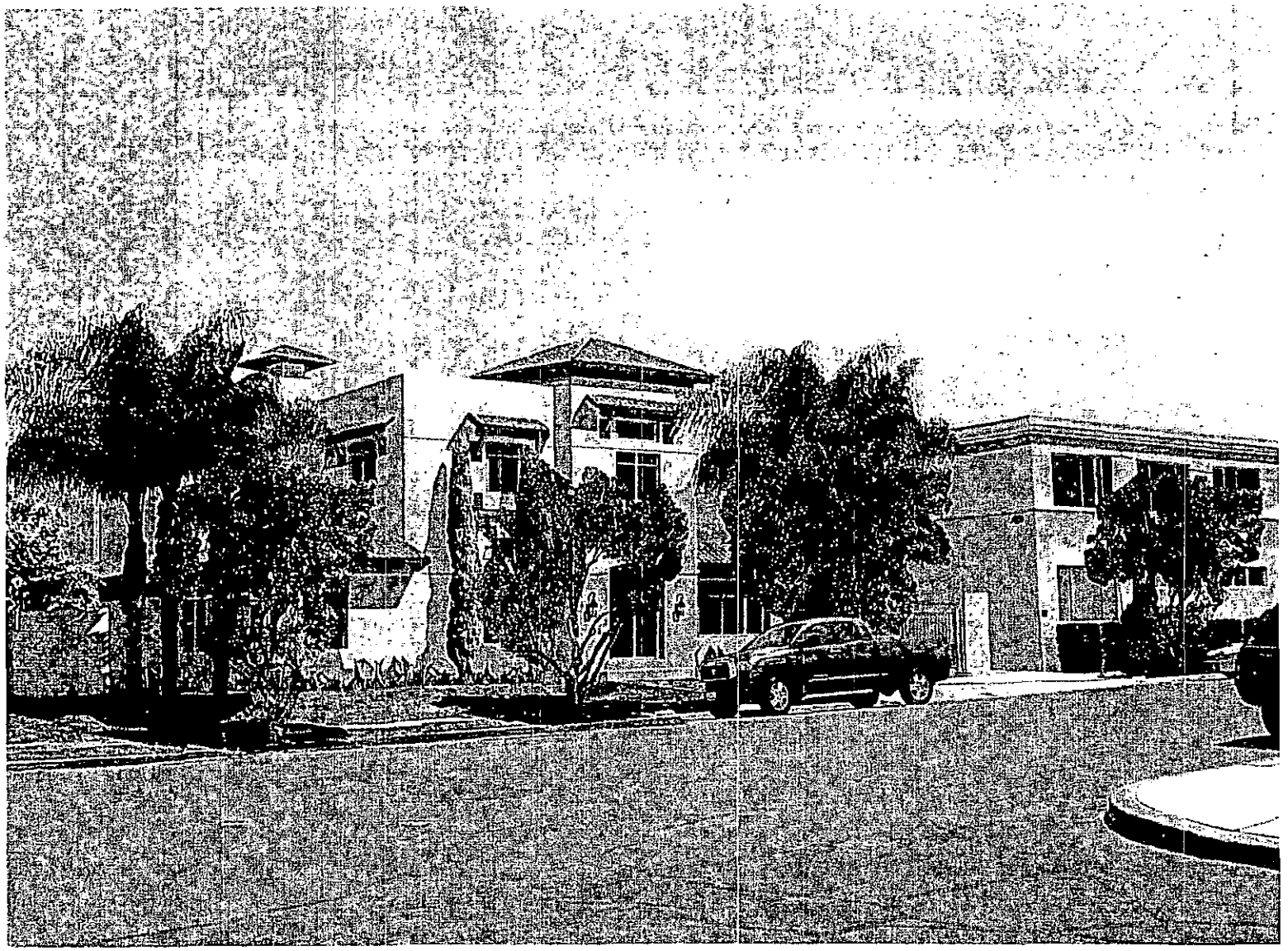
Existing Conditions Photo of Proposed Classroom Building - View Point Looking North

FIGURE 5.1-4



SOURCE: BRG Consulting, Inc., 2008

8/28/08

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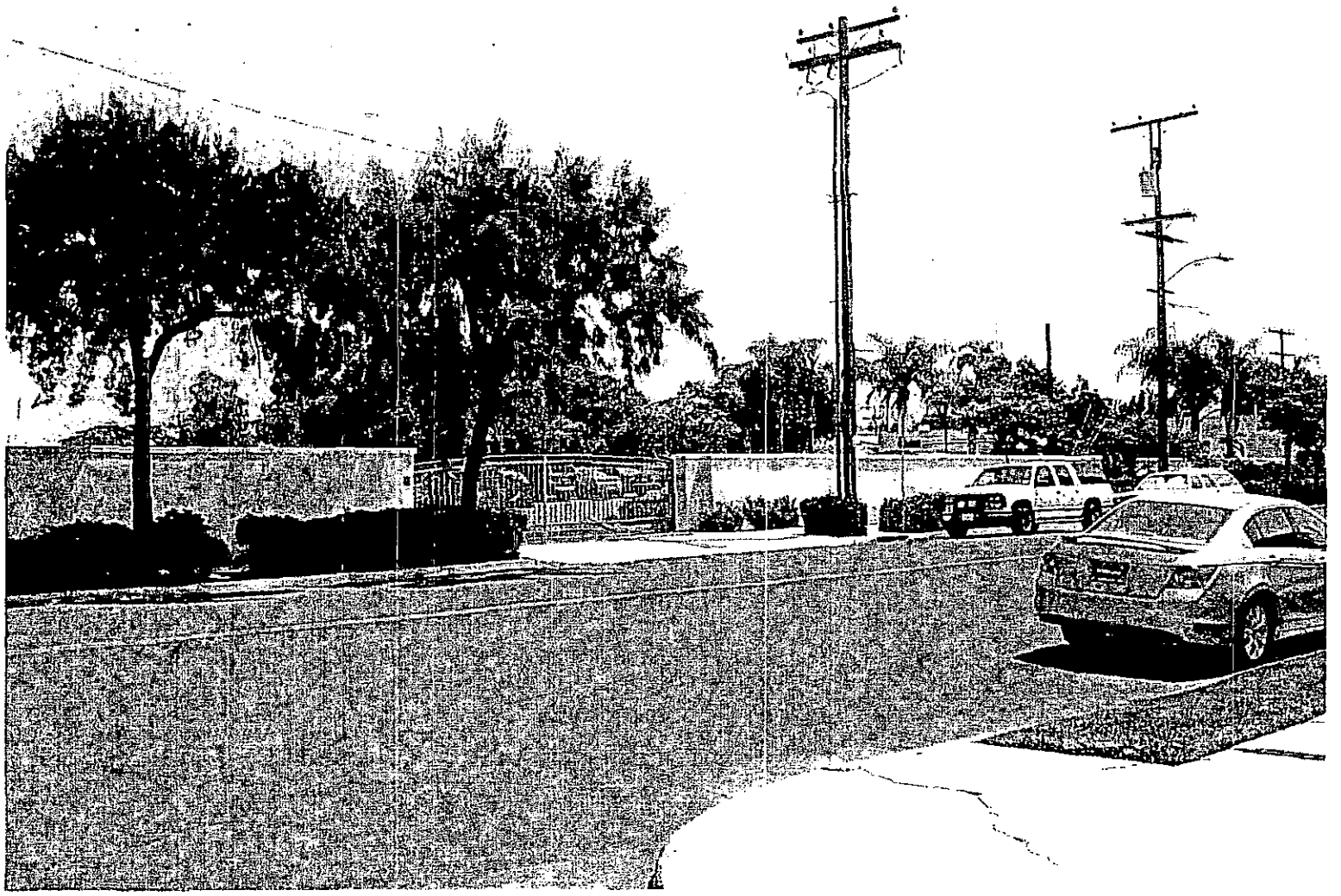
Photo Rendering of Proposed Classroom Building - View Point Looking North

FIGURE 5.1-5

F:\projects\635 Academy of Our Lady of Peace\Draft EIR\Chapter 5.1\Figure 5.1-5 Photo Rendering of Classroom Looking North02.ai



SOURCE: McArdle and Associates Architects, 2008

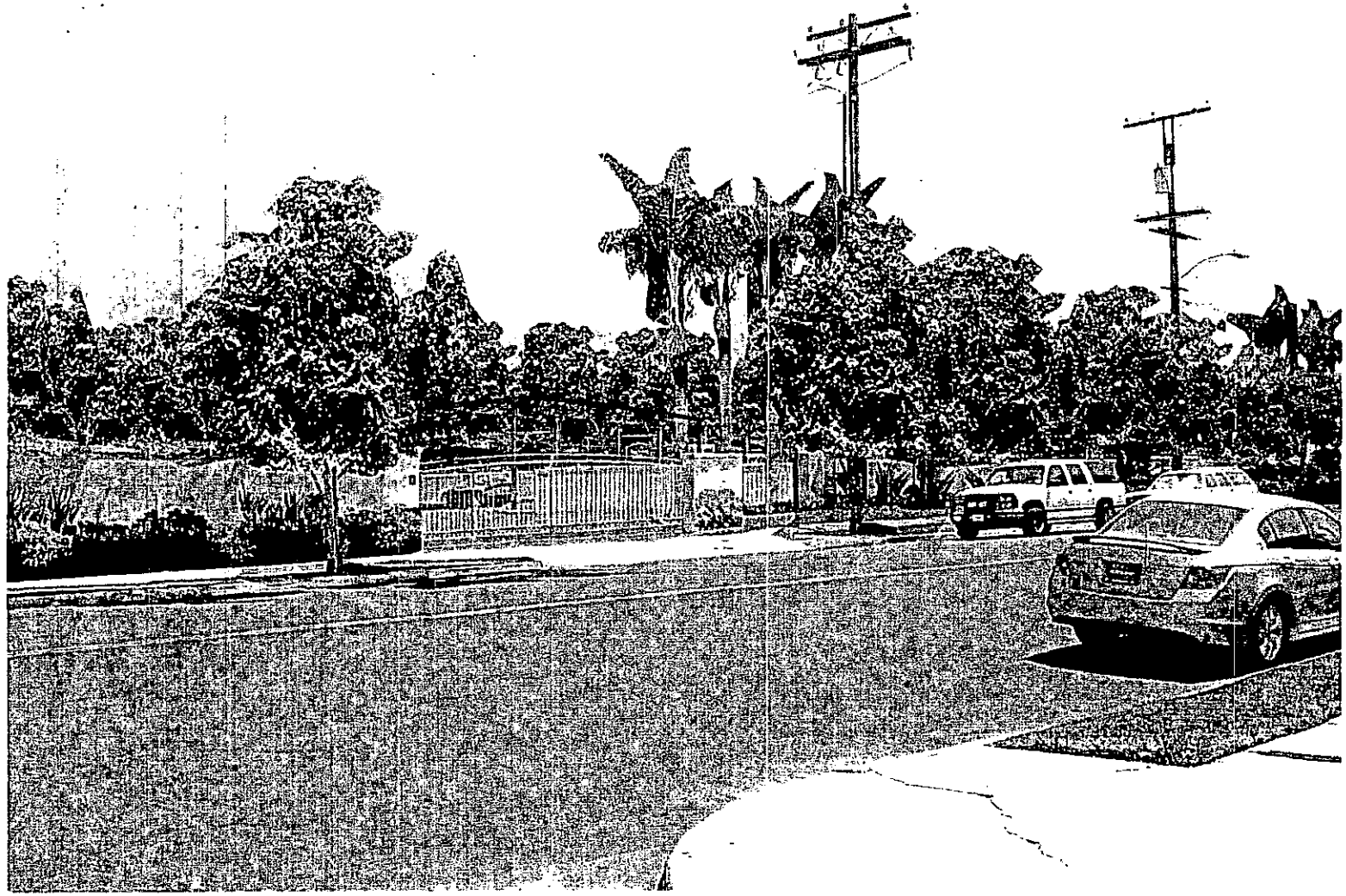
6/27/08

BRG CONSULTING, INC.

Academy of Our Lady of Peace

Existing Conditions Photo of Proposed Parking Structure - View Point Looking North

FIGURE 5.1-6



SOURCE: BRG Consulting, Inc., 2008

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BRG CONSULTING, INC.

Academy of Our Lady of Peace

Photo Rendering of Proposed Parking Structure - View Point Looking North

FIGURE 5.1-7

F:\projects\635 Academy of Our Lady of Peace\Draft EIR\Chapter 5.1\Figure 5.1-7 Photo Rendering of Parking Structure Looking North.ai

In addition, the proposed project would also include the renovation of the existing street frontage landscaping for the entire campus, as well as landscape renovation of the Point and Meditation Garden. Existing trees on the project site and located in the public right-of-way immediately adjacent to the Academy are proposed to be removed in order to construct the classroom building, parking structure, and to make street and sidewalk landscape improvements. Landscaping is proposed for the remainder of the frontage streetscape that would recreate an historic streetscape using a plant palette appropriate to the history and style of the school as well as the surrounding local context.

Therefore, the proposed project would not affect the existing visual character of the site and surrounding area, particularly with respect to views from any major roadways and public viewing areas. As such, no significant impact to the aesthetics/neighborhood character would occur.

5.1.3.4 *Light/Glare*

As previously discussed, the project would be constructed with materials that are compatible with the existing campus. As such, the project would not emit or reflect a significant amount of light or glare that would impact adjacent uses. In addition, based on the proposed landscape plan for the proposed project, a 10 to 15 foot tall clipped podocarpus hedge would be planted on the west side of the proposed classroom building to provide screening for adjacent neighbors and from the strong afternoon sun. Similarly, the increase in development area associated with the proposed project would result in an increase in the amount of ambient light shed into the nighttime sky. However, the project is located within a densely urbanized area. The increase in nighttime light emissions would comply with City regulations and would not be substantially different than surrounding development. Therefore, light/glare impacts would not be significant.

Therefore, the proposed project would not affect the existing visual character of the site and surrounding area.

5.1.4 Significance of Impacts

Implementation of the proposed project would involve construction of a wall on the northern slope for both the parking structure and classroom building, which could result in an aesthetic impact. In order to minimize the color contrast with the vegetated slope, the lowest level of the structures would be painted with a color match the tonality of the slope.

5.1.5 Mitigation Measures

ANC-1 The lowest color band of the proposed parking structure and the classroom building shall match the tonality of the north-facing slope in order to minimize the visual impact of these structures in the canyon area.

5.1.6 Conclusions

Implementation of Mitigation Measure ANC-1 would reduce the potential aesthetic impact to a leve less than significant.

5.2 Biological Resources

Information contained in this section is summarized from the *Biological Resources Technical Report for the Academy of Our Lady of Peace* (Rocks Biological Consulting, Inc., June 16, 2008). This document is provided in Appendix B of this EIR.

5.2.1 Existing Conditions

5.2.1.1 Regulatory Setting

City of San Diego's Multiple Species Conservation Program (MSCP) Sub area Plan

The City of San Diego's Multiple Species Conservation Program (MSCP) Sub area Plan has been prepared pursuant to the general outline developed by the United States Fish and Wildlife Service (USFWS) and California Department of Fish and Game (herein referred to as "wildlife agencies") to meet the requirements of the California Natural Communities Conservation Planning (NCCP) Act of 1992. This Sub area Plan forms the basis for the Implementing Agreement which is the contract between the City of San Diego and the wildlife agencies that ensures implementation of the plan and thereby allows the City of San Diego to issue "take" permits at the local level. The Multi-Habitat Planning Area (MHPA) is a preserve area established by the MSCP to delineate core biological resource areas and corridors targeted for conservation. Limited development in these areas is allowed to occur and is regulated by the Biology Guidelines (2002) for the Environmentally Sensitive Lands (ESL) regulations in the City of San Diego Land Development Code. The project site is not located within or adjacent to the MHPA of the City's MSCP.

Endangered Species Act

The Endangered Species Act (ESA) was enacted in 1973 to establish a program to identify and conserve declining species of plants and animals in an effort to prevent extinction. The ESA prohibits killing or harming an endangered species in any way, including significant modification of the species' critical habitat. It requires federal agencies to develop programs to conserve endangered and threatened species and assist in population recovery. Under the ESA, a species likely to become extinct in the foreseeable future is categorized as "endangered" while one likely to become endangered is categorized as "threatened." However, given that no direct impacts to federally endangered species are anticipated from the project, "take" permits issued from the U.S. Fish and Wildlife Service (USFWS) would not be necessary.

The Clean Water Act of 1977 and 1987

The purpose of the Clean Water Act (CWA) of 1977 & 1987 is to restore and maintain the chemical, physical, and biological integrity of the Nation's waters through prevention and elimination of pollution. The CWA applies to any discharge of a pollutant into Waters of the United States. The term "Waters of the United States" has a broad meaning and incorporates both deepwater aquatic habitats and special aquatic sites, including wetlands and wetland vegetation as follows:

- the territorial seas with respect to the discharge of fill materials;
- coastal and inland waters, lakes, rivers, and streams that are navigable Waters of the United States, including their adjacent wetlands;
- tributaries to navigable Waters of the United States, including adjacent wetlands;
- interstate waters and their tributaries, including adjacent wetlands; and
- all other Waters of the United States not identified above, such as isolated wetlands and lakes, intermittent streams, prairie potholes, and other waters that are not a part of a tributary system to interstate waters or navigable Waters of the Unites States, the degradation or destruction of which could affect interstate commerce.

No Army Corps of Engineers (ACOE), California Department of Fish and Game (CDFG), or City of San Diego jurisdictional wetlands were identified within the project site.

5.2.1.2 Physical Setting

The project site is developed with the existing school buildings and associated parking and landscaping on the southern, flatter portions of the project site. Immediately north of the developed area, the project site has prominent north-south trending ridgelines, with residential housing surrounding the site to the south and east, and with an undeveloped canyon area to the north and northwest.

A. Vegetation

A total of seven vegetation communities were identified within the project site. Of these vegetation communities, the project site primarily supports southern maritime chaparral, eucalyptus woodland, and developed areas, which comprise 20.2 acres of the 23-acre project site, collectively. Figure 5.2-1 depicts the location of these existing vegetation communities within and surrounding the project site. The following describes the characteristics of each of the vegetation communities.

Southern Maritime Chaparral (14.3 acres; Tier I habitat) is a low, relatively open chaparral that occurs on weathered sands within the coastal fog belt. This habitat is typically dominated by such species as wart-stemmed ceanothus, Del Mar manzanita, summer-holly, Del Mar sand aster, and sea dahlia, among others. Other species that commonly occur in this habitat are chamise, mission manzanita, and toyon. As with other chaparral associations, fire appears to be necessary for continued reproduction of many of the characteristic species within southern maritime chaparral (Holland 1986).

Distinguishing between southern maritime chaparral and southern mixed chaparral can be difficult, especially in coastal areas where ecotonal or transitional associations between the two types often occur. Important differences between these habitat types include the number and dominance of characteristic southern maritime chaparral species (some of which are listed above), the structural characteristics of the vegetation, and the range of soil types and geographical areas over which these habitats occur. Species such as Del Mar manzanita, wart-stemmed ceanothus, summer-holly, and others tend to be more frequent and have increased dominance in southern maritime chaparral, while species such as chamise, toyon, and

mission manzanita typically dominate southern mixed chaparral. Species richness (the number of species per unit area) also seems to be higher in southern maritime than in southern mixed chaparral. Southern maritime chaparral is also often more open and lower growing, possibly as a result of its apparent restriction to relatively infertile, weathered sandstone soils. Geographically, southern maritime chaparral is restricted primarily to the coastal fog belt. In contrast, southern mixed chaparral is more wide ranging and occurs on a variety of soil types.

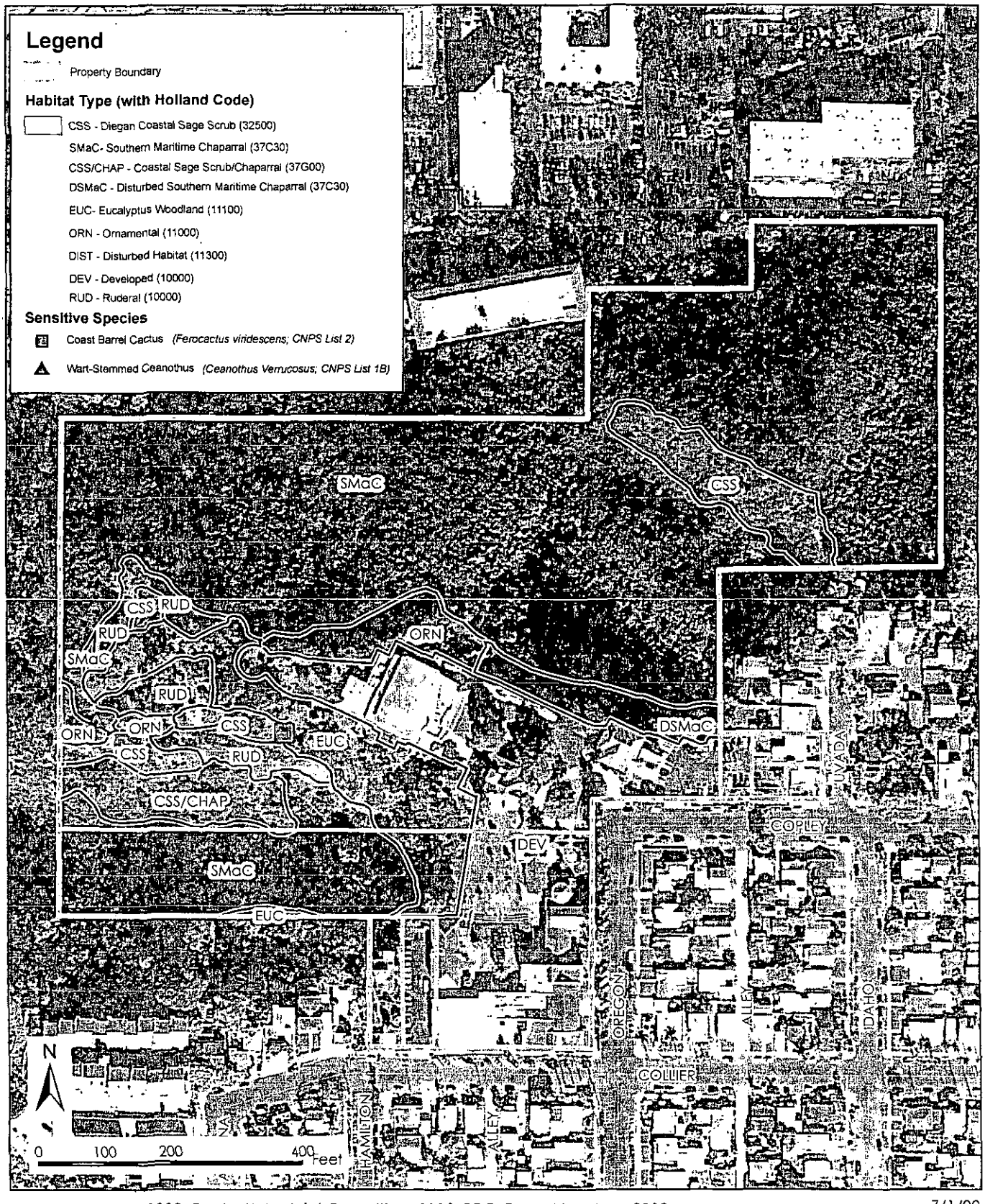
On the project site, this community was mapped as southern maritime chaparral based on Attachment I (A) (2) of the *City of San Diego Guidelines for Conducting Biological Surveys*, and direction from Development Services staff. Plant species observed within this habitat on site include mission manzanita, spiny redberry, laurel sumac, wart-stemmed ceanothus, lemonadeberry, and toyon. As depicted in Figure 5.2-1, southern maritime chaparral is located within the northern and southwestern portions of the project site.

Coastal Sage Scrub (1.1 acres; Tier II habitat) is comprised of low, soft-woody subshrubs to about one meter (3 feet) high, many of which are facultatively drought-deciduous. Shrubs present in this community on the project site include California Sagebrush, California Buckwheat, and Laurel Sumac. As depicted on Figure 5.2-1, a small portion of coastal sage scrub is located within the western portion of the project site. In addition, coastal sage scrub is located northwest and northeast portions of the project site.

Coastal Sage Scrub/Chaparral (0.6 acres; Tier II habitat) is a mixed community that includes both drought-deciduous sage scrub and woody chaparral species, and is apparently a post-fire successional community. Total vegetative cover includes roughly equal amounts of both scrub and chaparral species. Characteristic dominant species noted onsite include lemonadeberry, California sagebrush, and black sage. As depicted on Figure 5.2-1, a small area of coastal sage scrub/chaparral is located in the southwestern portion of the project site.

Eucalyptus Woodland (1.5 acres; Tier IV habitat) communities are lands dominated by Eucalyptus trees. Little or no understory vegetation occurs in dense Eucalyptus Woodlands because of thick accumulation of leaf litter that tends to accumulate under Eucalyptus trees. Eucalyptus trees are non-native species that were imported from Australia and are of limited biological value except for potential raptor nesting. As depicted in Figure 5.2-1, eucalyptus woodlands are located within the western and southwestern portions of the project site.

Ruderal (0.7 acres, Tier IV) or disturbed, habitat typically includes areas that have been previously disturbed by development or agricultural activities. It includes lands generally of vegetation such that little or no natural habitat remains and lands disturbed such that at least 50 percent of plant cover is broad-leaved non-native species. The ruderal vegetation within the project site consists of species such as Short-pod Mustard, Russian Thistle, and Cheeseweed. As depicted on Figure 5.2-1 the ruderal (disturbed) vegetation is located within the northern and western portions of the project site.



SOURCE: SanGIS, 2008; Rocks Biological Consulting, 2008; BRG Consulting, Inc., 2008

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BRG CONSULTING, INC.

Academy of Our Lady of Peace

Existing Biological Resources

FIGURE 5.2-1

C:\projects\425 Academy Our Lady of Peace\3rd Screencheck EIR\Chapter 5\Figure 5.2-1 Existing Biological Resources.mxd

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Ornamental (0.6 acres; Tier IV) vegetation typically consists of non-native landscape and/or garden plantings that have been planted in association with buildings, roads, or other development. San Diego County supports more than 250 different types of ornamental trees and numerous shrubs and herbs that decorate urban areas. The ornamental species onsite include Pine trees and iceplant. As depicted in Figure 5.2-1, ornamental species are located within the northern and western portions of the project site.

Developed (4.6 acres; Tier IV) areas typically support no native vegetation because of the presence of buildings, roads, parking lots, and other features such as maintained lawns. The Developed areas onsite include the existing school buildings and associated parking.

B. Wetlands

No Army Corps of Engineers (ACOE), California Department of Fish and Game (CDFG), or City of San Diego jurisdictional wetlands were identified within the project site.

C. Wildlife

Animal species within the project site are typical of an urban canyon setting. Bird species noted on the project site were common species such as California Towhee, Northern Mockingbird, Wren tit, Bewick's Wren, and Red-tailed Hawk. A Blue-Grey Gnatcatcher was also observed within the project site and was distinguished from the rarer California Gnatcatcher based on its prominent white tail feathers.

D. Sensitive Species

Per CEQA, sensitive plants, animals, and habitats include all those that are native to the area as well as those that are defined as covered species by the City MSCP; or are rare and/or endangered, or depleted or declining according to the USFWS, CDFG, California Native Plant Society (CNPS). General surveys were conducted for sensitive plants, animals, and habitats. A CNPS and CDFG's Natural Diversity Database (CNDDB) record search was performed for the La Jolla 7.5' minute quadrangle.

The project site supports CNPS List 2 species wart-stemmed Ceanothus and coast barrel cactus. No wart-stemmed Ceanothus occurs in the proposed impact area, and coast barrel cactus occurs only in impact-neutral Brush Management Zone 2 areas. Additionally, there is the potential for the occurrence of sensitive birds/raptors on-site due to the presence of nesting and perching areas. Table 5.2-1 summarizes the potential for narrow endemic Species (City of San Diego 1997) occurrence within the project site. Narrow endemic species are those with a very restricted habitat and occur only in the San Diego region. Specific protections apply to narrow endemic species pursuant to the MSCP.

Based on the information provided in Table 5.2-1, this is a low potential for any narrow endemic plant species to occur within the project site.

TABLE 5.2-1
Potential for Narrow Endemic Plant Species to Occur Within the Project site

Species	Potential to Occur/Comments
San Diego Thornmint	Low. Species occurs on clay lenses in open, generally grassland areas. Suitable habitat for this species does not occur in the project site.
Shaw's Agave	None. Species occurs exclusively on coastal bluffs.
San Diego Ambrosia	Low. Species occurs in disturbed areas, seasonally dry drainages and floodplains. The project site is not near a floodplain and generally supports dense vegetation that would preclude this species.
Aphanisma	None. Species occurs on coastal bluffs and dunes.
Coastal Dunes Milk Vetch	None. Species occurs on coastal dunes.
Encinitas baccharis	None. Species occurs in southern maritime and southern mixed chaparral on sandstone soils, typically in north San Diego County. Would have been observed if present within the project site.
Short-leave Liver-Forever	None. Sandstone bluff soil formation habitat of species does not occur within the project site.
Variegated Dudleya	Low. Habitat is typically openings in coastal sage scrub or grasslands. There is very little suitable habitat for this species within the project site.
San Diego Button-Celery	None. Vernal pool species; no vernal pool habitat is located within the project site.
Otay Tarplant	None. Species occurs in grasslands and coastal sage scrub in clay soils in southern San Diego County. The project area is outside of this species' geographic range.
Prostate Navarretia	None. Vernal pool species; no vernal pool habitat in located within the project site.
Snake Cholla	None. This species occurs in chaparral and coastal sage scrub in southern San Diego. Would have been observed if present.
Orcutt Grass	None. Vernal pool species; no vernal pool habitat is located within the project site.
San Diego Mesa Mint	None. Vernal pool species; no vernal pool habitat is located within the project site.
Otay Mesa Mint	None. Vernal pool species; no vernal pool habitat is located within the project site.

Source: Rocks Biological Consulting, 2008.

5.2.2 Impact Threshold

The City of San Diego Significance Determination Thresholds outlines the thresholds for determining significance. Impacts to biological resources may be considered significant if the project could:

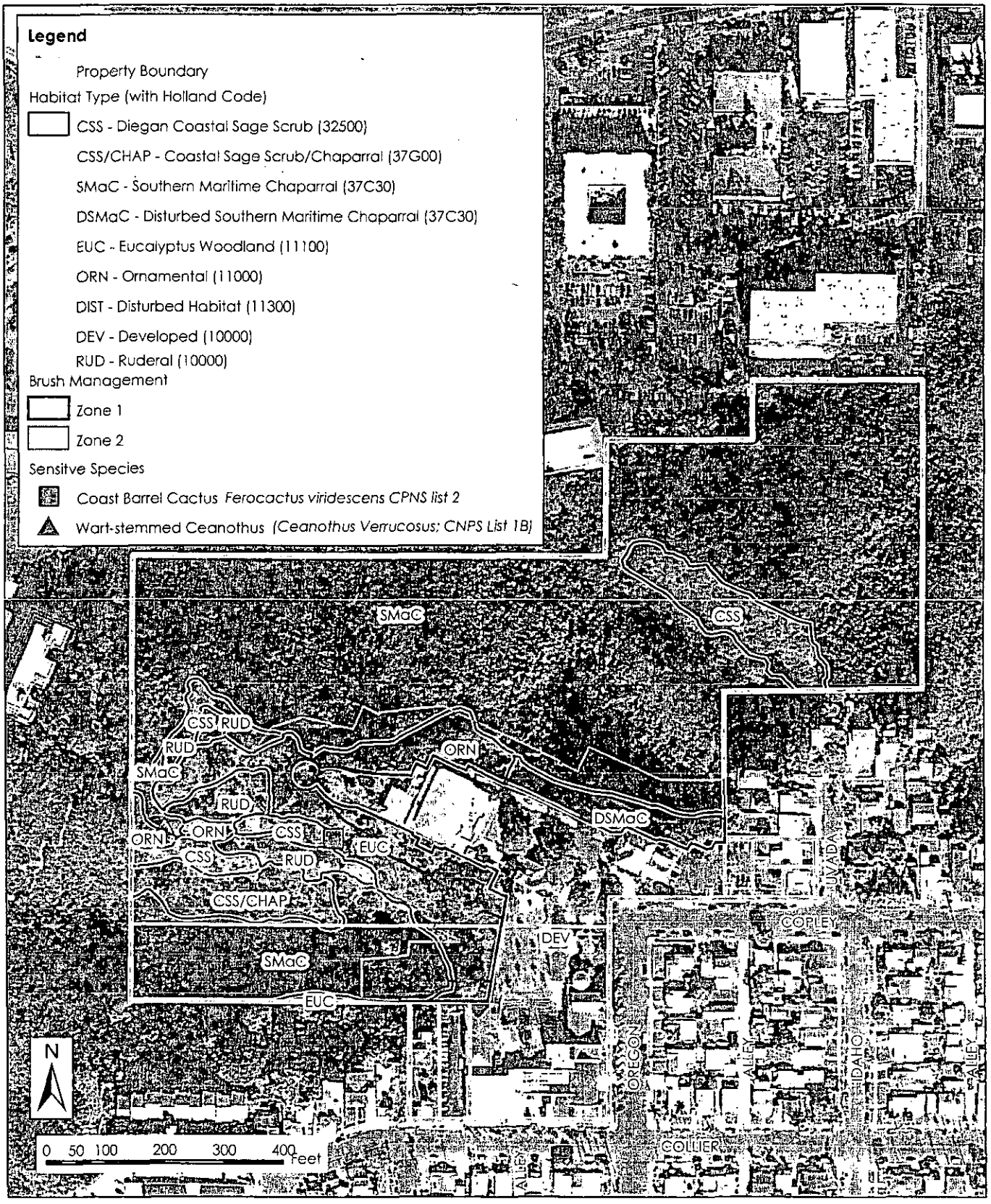
- *Result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies, or regulations, or by the CDFG or USFWS;*
- *Result in a substantial adverse impact on any Tier I, II, IIIA, or IIIB Habitats as identified in the Biology Guidelines of the Land Development manual or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFG or USFWS;*
- *Result in a substantial impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means;*
- *Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites;*
- *Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional or state habitat conservation plan, either within the MSCP plan area or in the surrounding region;*
- *Introduce land use within an area adjacent to the MHPA that would result in adverse edge effects;*
- *Conflict with any local policies or ordinances protecting biological resources; and/or,*
- *Introduce invasive plant species into a natural open space area.*

5.2.3 Impacts

The proposed project includes the development of a new classroom building and parking structure within the existing Academy's campus. The majority of this development occurs on previously developed areas, where residential development owned by the Academy currently exist. In addition, to this development, the proposed project would be required by City regulations to include two brush management zones (Zone 1 and Zone 2). Figure 5.2-2 depicts the proposed limits of impact.

Issue 1: **Would the proposed project reduce the level of diversity or numbers of any unique, rare, endangered, sensitive, or fully protected species of plants or animals?**

Issue 2: **Would the project directly or indirectly impact sensitive habitat or species, including but not limited to City, State, or federally regulated habitats or species such as wetlands through direct removal, filing, hydrological interruption, or other means?**



SOURCE: SanGIS, 2008; Rocks Biological Consulting, 2008; BRG Consulting, Inc., 2008 7/1/08

BRG CONSULTING, INC.

Academy of Our Lady of Peace

Biological Resources Impacts

FIGURE 5.2-2

J:\projects\435 Academy Our Lady of Peace\3rd Screencheck EIR\Chapter 5\Figure 5.2-2 Biological Resources Impacts.mxd

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5.2.3.1 *Habitat and Flora/Fauna Impacts*

Impacts are described as either direct or indirect and temporary or permanent. A direct impact may be defined as one that results in a temporary or permanent loss of individuals or habitat. An indirect impact may include the undetermined, potential effects of noise or introducing humans and/or pets to an area where access was previously restricted.

A. Direct Impacts

Direct impacts of the proposed project including the required Zone 1 brush management area would result in the loss of 0.6 acres of southern maritime chaparral and 0.1 acres of ornamental vegetation. However, ornamental vegetation is not considered a mitigable habitat. With the implementation of Mitigation Measure BR-1 through BR-4 and BR-7 through BR-10, impacts to southern maritime chaparral would be mitigated to a level less than significant.

Impacts associated with the Zone 2 brush management zone are considered 'impact neutral' pursuant to the City of San Diego Biology Guidelines and MSCP Sub area Plan. No mitigation is required for this activity when brush management is performed pursuant to City regulations and impacts to nesting birds during the breeding season are avoided per the Migratory Bird Treaty Act and/or the CDFG Bird Code. Pursuant to the California Fish and Game Code (§3503, it is unlawful to take, possess, or needlessly destroy avian nests or eggs. Therefore, the project would have a potential direct impact associated with clearing habitat that supports nest or eggs, if performed during the general bird breeding season from February 1 – September 15.

No impacts to sensitive species are expected to occur with the implementation of the proposed project, as no sensitive species are known to occur within the directly impacted areas. The site supports CNPS List 2 species wart-stemmed ceanothus and coast barrel cactus. No impacts are anticipated as no wart-stemmed ceanothus occurs in the proposed impact area, and coast barrel cactus occurs only in impact-neutral Brush Management Zone 2 areas and is not usually thinned due to it's low growing succulent nature. Therefore, no impacts to sensitive plant species are anticipated with project implementation.

B. Indirect Impacts

There is the potential for increased erosion due to vegetation modification with the implementation of the proposed project. These impacts would be temporary and minor in nature and dust impacts would be primarily offset by required pre- and post-construction water quality best management practices as discussed in Section 5.5 of this EIR and would be less than significant.

Sensitive bird species such as the California gnatcatcher and coastal cactus wren have the potential to occur on-site. In addition, the site has a potential to support nests, especially raptor nests, that would be protected under the Migratory Bird Treaty Act and other environmental law. Pregrading nest surveys for construction during the breeding season (with appropriate mitigation if nesting birds are present) would be required to reduce CEAQ impacts to breeding birds to below a level of significance. With implementation of Mitigation Measures BR-5 and BR-6, indirect impacts to sensitive species associated with noise would be mitigated to a level less than significant.

The project site is located adjacent to sensitive habitats and within 1,000 feet of City MHPA preserve lands. Invasive plant species, especially wind-dispersed species, could migrate to these areas and have an adverse indirect impact on native habitat if invasive plants are planted on-site. To avoid and mitigate for this potential impact, the project shall be conditioned to avoid landscaping with invasive plant species. With implementation of Mitigation Measure BR-10, indirect impacts to sensitive habitat communities associated with potentially invasive landscaping would be mitigated to a level less than significant.

As discussed above, no jurisdictional wetland habitat occurs within or adjacent to the project site. Therefore no direct or indirect impacts to wetland habitat would occur with the implementation of the proposed project.

Issue 3: Would the project interfere with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors?

5.2.3.2 *Wildlife Species*

The proposed project area is not identified as a regional or local wildlife corridor and does not currently function as a wildlife corridor or linkage based on the current conditions of existing development and presence of humans on the campus and adjacent residential units. In addition, the construction and operation of the proposed project would not interfere with the movement of any resident or migratory fish or wildlife species. However, the site has a potential to support nests that would be protected under CEQA, the CDFG CA Bird Code-Section 3500 and the Migratory Bird Treaty Act (MBTA); therefore, there is a potential impact if clearing is proposed, or occurs during the breeding season. With the implementation of Mitigation Measures BR-5 and BR-6, impacts to wildlife species would be mitigated to a level less than significant.

Issue 4: Would the project conflict with the provisions of the ESL, MSCP or other approved local, regional or state habitat conservation plan?

5.2.3.3 *Compliance with ESL, MSCP, and Other Applicable Plans*

The project does not lie in or immediately abut an MSCP Multi-Habitat Planning Area. The nearest MHPA lands are located approximately 1,000 feet to the east of the site, on the opposite side of Interstate 805, and approximately 2,000 feet to the west. No impacts to the preserve are anticipated with the implementation of the proposed project. Furthermore, the proposed project would incorporate the MSCP Sub area Plan's Land Use Adjacency Guidelines (due to the indirect connection of the site to MHPA areas in Mission Valley) and would not conflict with the provisions of the ESL, MSCP or other approved local, regional or state habitat conservation plan as all impacts would be reduced to a level below significance via CEQA/ESL/MSCP compliant mitigation. Impacts associated with this issue are considered less than significant.

5.2.4 Significance of Impacts

Implementation of the proposed project has the potential to result in permanent impacts to sensitive flora/habitats and fauna and indirect temporary impacts to wildlife species. Both permanent and indirect

impacts to biological resources located within the project site are considered significant, and mitigation is required.

5.2.5 Mitigation Measures

5.2.5.1 General Measures

BR-1 Prior to the issuance of a Notice to Proceed (NTP) or any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits the Assistant Deputy Director (ADD) environmental designee of the City's Land Development Review Division (LDR) shall verify that the grading and/or construction plans include an index of sheets shown on the first map sheet which includes "Environmental Requirements" and the following statement "The Academy of Our Lady of Peace (PTS No. 130619/LDR No. 42-7863) development project is conditioned to have a qualified biological monitor on-site as determined at the preconstruction meeting. The project and shall conform to the Mitigation Monitoring and Reporting Program conditions as contained in the environmental document (PTS No. 130619/LDR No. 42-7863, SCH No. 2008021024) and as shown verbatim on sheet(s)__." Please note, additional related mitigation features and/or notes can also be included on individual map sheets where appropriate (i.e. depicting areas of reduced width areas of brush management zones, etc.)."

BR-2 Prior to issuance of any grading permits, the owner/permittee shall make arrangements to schedule a pre-construction meeting to ensure implementation of the MMRP. The meeting shall include the City Field Resident Engineer (RE), the monitoring biologist, and staff from the City's Mitigation Monitoring and Coordination (MMC) Section.

5.2.3.2 Biological Resources

A. Upland Mitigation

BR-3 The proposed project site includes a total of 23.3 acres. Prior to recordation of the first final map and/or issuance of grading permits (which ever comes first), impacts to 0.6 acres of southern maritime chaparral (located outside the MHPA) shall be mitigated to the satisfaction of the City Manager through off-site preservation of upland habitats in conformance with the City's Environmentally Sensitive Lands Ordinance (ESL) (Option A); or through payment into the City's Habitat Acquisition Fund No. (Option B).

Option A: For the off-site preservation option, the owner/permittee shall record a Covenant of Easement, Conservation Easement, or dedication in fee title to the City of San Diego for a total of 0.6 acres inside the MHPA in Tiers I-III, or 1.2 acres of Tier I habitat outside the MHPA.

Option B: For the HAF option, the applicant shall pay an estimated total of $23,100 into the fund (Assumes mitigation within MHPA, at current City rate. of $35,000 per acre + 10 % administration fee (both of which are subject to change), at 0.6 acres, = $23,100.

B. Preconstruction Measures

BR-4. Prior to the issuance of any grading permits and/or the first pre-construction meeting, the owner/permittee shall submit evidence to the ADD or LDR verifying that a qualified biologist has been retained to implement the biological resources mitigation program as detailed below (A through D):

A. Prior to the first pre-construction meeting, the applicant shall provide a letter of verification to the ADD of LDR stating that a qualified Biologist, as defined in the City of San Diego Biological Resource Guidelines (BRG), has been retained to implement the revegetation plan.

B. At least thirty days prior to the pre-construction meeting, a second letter shall be submitted to the MMC section which includes the name and contact information of the Biologist names of all persons involved in the Biological Monitoring of the project, if changed and/or not provided in the first letter.

C. At least thirty days prior to the pre-construction meeting, the qualified Biologist shall verify that any special reports, maps, plans and time lines, such as but not limited to, revegetation plans, plant relocation requirements and timing, avian or other wildlife (including USFWS protocol) surveys, impact avoidance areas or other such information has been completed and approved by City MMC.

D. The qualified biologist (project biologist) shall attend the first preconstruction meeting and perform measures listed under General Birds below (i.e. perform any required pre-grading/construction bird surveys.

C. General Birds

BR-5 In order to comply with the Federal Migratory Bird Treaty Act, and CA Department of Fish and Game (CDFG) Code (which essentially prohibits any take of bird species - including disturbance of eggs, fledglings, nests, or plants/ substrate the nest is located in, or causing adults to abandon nests), the project biologist shall verify that no nesting birds are present on any portion of the project site or nearby vicinity (including off-site areas to be impacted) during grading and construction operations that would be disturbed indirectly or directly by the project, especially during the typical bird breeding season between February 1 and September 15. If any breeding birds would be directly impacted by grading, breeding season work shall be avoided, or the project biologist shall work with EAS and the appropriate wildlife agencies (i.e. US Fish and Wildlife Service and CDFG) to determine appropriate mitigation.

BR-6 Prior to any construction activity that would create noise levels above 60 dB within the development area during the raptor breeding season (February 1 through September 15) the biologist shall ensure that no raptors are nesting. If construction occurs during the raptor breeding season a preconstruction survey would be conducted and no construction would be allowed within 300 to 500 feet of any identified nest(s) until the young fledge. Should the biologist

determine that raptors are nesting, an active nest shall not be removed until after the breeding season.

D. Construction Measures

BR-7 As determined at the Preconstruction Meeting, the project biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance within onsite, and surrounding sensitive habitat as shown on the approved Exhibit A.

BR-8 All construction activities (including staging areas) shall be restricted to the development area as shown on the approved Exhibit A. The project biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas beyond the limits of disturbance as shown on the approved Exhibit A.

E. Preconstruction Measures

BR-9 The following measures are required in order to carry out and ensure the successful revegetation of the graded portions of the Biology Buffer and Zone 2 Brush Management Areas (although these direct impacts will be mitigated of site per ESL ratios – the following 25 month revegetation program is required:

A. Final Grading Report
   1. Biological Monitoring
      a. All biological monitoring and reporting shall be conducted by a PQB or QBM, as appropriate, consistent with the LCD.
      b. The PQB or QBM shall oversee implementation of post-construction BMP's, such as gravel bags, straw logs, silt fences or equivalent erosion control measure, as needed to ensure prevention of any significant sediment transport. In addition, the PBQ/QBM shall be responsible to verify the removal of all temporary post-construction BMP's upon completion of construction activities. Removal of temporary post-construction BMPs shall be verified in writing on the final post-construction phase CSVR.

B. Submittal of Final Grading Report
   1. A Final Grading Report documenting any additional impact areas or problems during grading shall be prepared to document the completion of grading.
   2. The PQB shall submit two copies of the Final Grading Report which describes the results, analysis, and conclusions of all phases of the Biological Monitoring and Reporting Program (with appropriate graphics) to MMC for review and approval within 30 days following the completion of monitoring.
   5. The PQB shall submit revised Report to MMC (with a copy to RE) for approval within 30 days.
   6. MMC will provide written acceptance to the PQB and RE of the approved report.

F. Land Use MHPA Adjacency

BR-10 Prior to issuance of grading permits, the City shall verify that the project is in compliance with the MSCP Sub area Plan's Land Use Adjacency Requirements; and that the following site specific requirements are noted on the grading plans under the heading Environmental Requirements:

A. The qualified biologist (project biologist) shall supervise the placement of orange construction fencing or equivalent along the boundary of the development area as shown on the approved grading plans. MSCP covered and/or other sensitive species such as barrel cactus within brush management zone II should be flagged for preservation during thinning operations.

B. The project biologist shall meet with the owner/permittee or designee and the construction crew to conduct an on-site educational session regarding the need to avoid impacts outside of the approved development area.

C. During grading activities, the Best Management Practices for erosion control shall be implemented and monitored as needed to prevent any significant sediment transport. These practices may include but may not be limited to the following: the use of materials such as gravel bags, fiber rolls, sediment fencing, and erosion control matting to stabilize disturbed areas; and installation of erosion control materials, particularly on the downslope side of disturbed areas to prevent soil loss.

D. All construction activities shall take place only inside the fenced area. Grading materials shall be stored inside the fenced development area.

E. Prior to the release of the grading bond, the project biologist shall submit a letter report to the Environmental Review Manager that assesses any project impacts resulting from construction. In the event that impacts exceed the allowed amounts, the additional impacts shall be mitigated in accordance with the City of San Diego Land Developmental Zoning Code Update Biology Guidelines, to the satisfaction of the City Manager.

F. All drainage from development and sheet flow would flow into a new bioswale or be directed into existing street drainage areas.

G. All lighting associated with the project will be shielded and directed away from the urban/natural edge.

H. All plantings at the urban/natural edge shall be native, drought tolerant, and acceptable to the fire marshal. No invasive/non-native species shall be located on-site where they have the potential to invade on-site, or adjacent natural lands. All revegetation within Brush Management Zone 2 and/or within 100 feet of native habitat must be native chaparral or coastal sage scrub species.

I. Appropriate fencing as required by MSCP/Landscaping/Permit or Long Range Planning shall be installed at the rear of the property to protect open space areas from urban encroachment (students, visitors, plants and toxins). Typically these fences are 2 feet concrete base with open iron bars above to a maximum of 6 feet.

5.2.6 Conclusions

The proposed project has the potential to result in direct and indirect impacts to native habitats, flora and fauna. The proposed project has the potential to result in a permanent impact to southern maritime chaparral. However, the implementation of Mitigation Measures BR-1 through BR-4 and BR-7 through BR-10 would reduce this impact to a level less than significant. The proposed project has the potential to impact nesting birds during vegetation clearing. Implementation of Mitigation Measures BR-5 and BR-6 would reduce this impact to a level less than significant. The proposed project also has the potential to result in indirect temporary impacts to sensitive wildlife species due to noise and dust during construction and there is a potential for increased erosion due to vegetation modification with implementation of the proposed project. Implementation of Mitigation Measures BR-5 through BR-10 in addition to adherence to water quality best management practices as discussed in Section 5.5 of this EIR would reduce this impact to a level less than significant. Finally, the proposed project could indirectly impact sensitive vegetation communities by introducing non-native, invasive landscaping. Implementation of Mitigation Measure BR-10 would reduce this impact to a level less than significant.

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5.3 Geology/Soils

The following analysis summarizes the geotechnical report prepared by Petra Geotechnical, Inc. (Petra, December 18, 2007) evaluating the potential geologic condition impacts of the Proposed Project (Appendix C). Additional geotechnical investigation was conducted to determine the factor of safety of adjacent steep slopes (Petra, June 9, 2008). This addendum is also provided in Appendix C.

5.3.1 Existing Conditions

5.3.1.1 Site Topography

The project site is located in a developed upland area approximately one-half mile south of Mission Valley and about three miles east of Mission Bay. Ground surface in the project site vicinity slopes gently to the southeast. Topographically, the developed portion of the project site is located predominantly on relatively flat terrain; the northern edges of the proposed sites are located at the tops of slopes to tributary canyons of Mission Valley. The elevation of the level portion of the site is approximately 385 feet above mean sea level (msl). The lowest elevation of the property is approximately 175 feet msl in the open space area at the north portion.

5.3.1.2 Geologic Setting

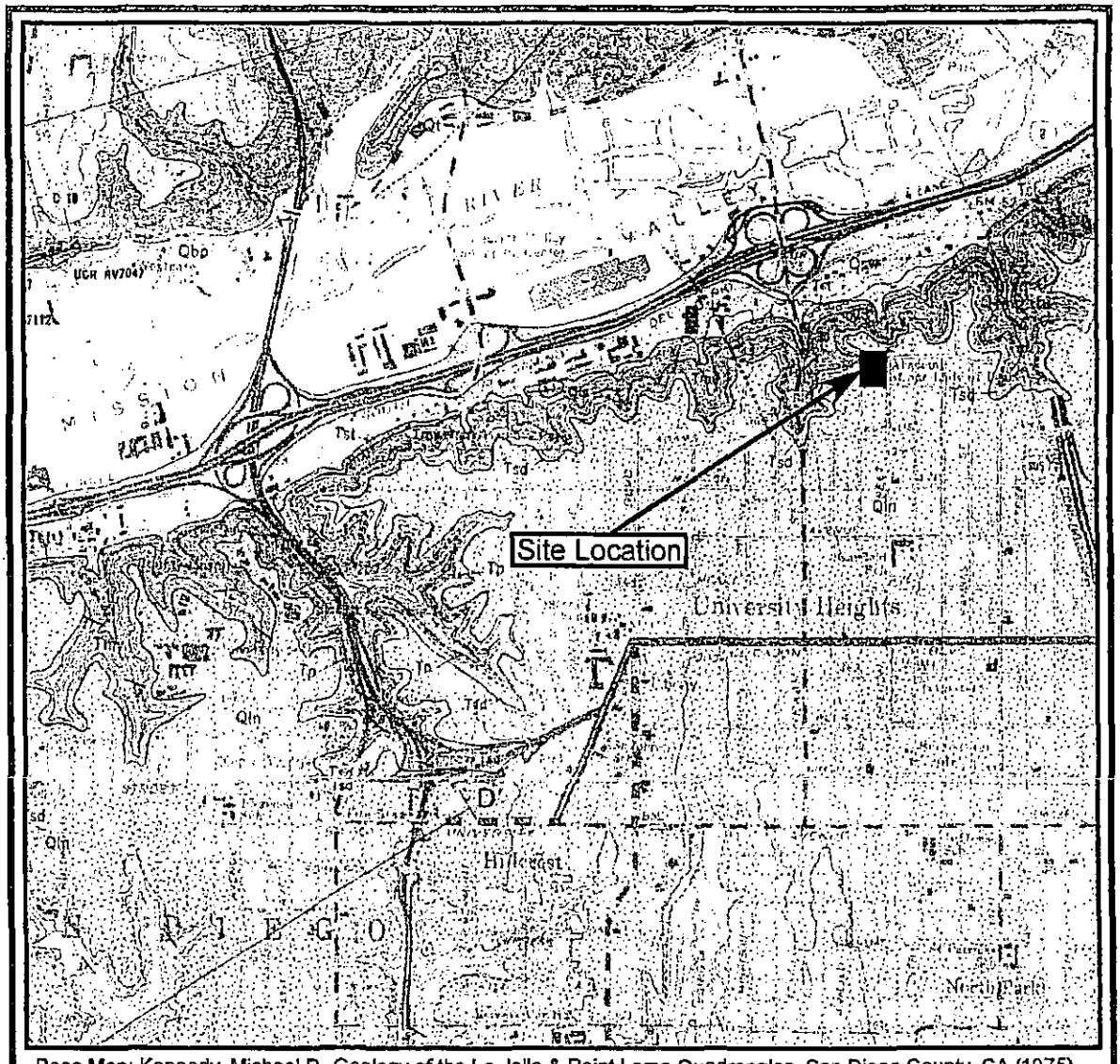
The project site is located within the western portion of the City of San Diego. The City of San Diego is located in the coastal portion of the Peninsular Ranges physiographic province of Southern California. These ranges are characterized by northwest-trending fault-bounded mountain ranges and broad intervening valleys. The mountain ranges within the province represent areas that have been uplifted by deformation along the northwest-trending faults. Valleys have been deformed downward and have been filled with sedimentary deposits. The oldest sedimentary rocks in the basin consist of Eocene-age sandstones, siltstones, and conglomerates. The immediate project site is underlain by the Linda Vista Formation (Figure 5.3-1).

The Lindavista Formation deposits underlying the site are expected to extend to depths associated with the anticipated classroom building and parking structure construction. The deposits are generally comprised of moderately well consolidated sediments consisting of mixtures of sand, silt, clay, and gravel. These sediments can be slightly to well cemented in less weathered portions of the formation.

Minor fill soils consisting of reworked Lindavista were observed on the slope surface at the northern portions of the classroom building and parking structures sites. These fills are likely associated with previous site development; the extent of the fills is unknown and would require exploration for proposed development in these areas.

5.3.1.3 Regional Seismicity

Historically, the San Diego coastal region has had far fewer earthquakes than most of Southern California.



Base Map: Kennedy, Michael P., Geology of the La Jolla & Point Loma Quadrangles, San Diego County, CA (1975).

Symbol Descriptions

Qaf	Artificial Fill	Tst	Stadium Conglomerate
Qsw	Slopewash		Contact (dashed where approximately located; dotted where concealed)
Qt	Stream-terrace deposits	U D 0 75	Fault, showing dip (dashed where approximately located; U, upthrown side; D, downthrown side; shear zone)
Qbp	Bay Point Formation	5	Strike and dip of bedding
Qln	Lindavista Formation		
Tsd	San Diego Formation		
Tp	Pomerado Conglomerate		
Tmv	Mission Valley Formation		

N W E S

0 2000
GRAPHIC SCALE
(In feet)

PETRA GEOTECHNICAL, INC.
12225 WORLD TRADE DRIVE, SUITE P
SAN DIEGO, CALIFORNIA 92128
PHONE: (858) 455-5530
COSTA MESA MURRIETA PALM DESERT SAN DIEGO SANTA CLARITA

REGIONAL GEOLOGY MAP

Academy of Our Lady of Peace Property

DATE:	Dec. 2007	J.N.:	431-07
DWG BY:	WBS	SCALE:	1" = 2000'

SOURCE: Petra Geotechnical Inc, 2008

02/05/08

Academy of Our Lady Of Peace

Underlying Geological Formations

FIGURE 5.3-1

C00288

The closest "active fault" is the Rose Canyon Fault, located approximately 3.3 miles west of the project site. The Rose Canyon fault is part of the regional right-lateral strike-slip fault system. The closest "potentially active" fault is located less than 800 feet west of the project site. Other regional faults include the Elsinore, San Jacinto, and San Andreas faults to the northeast, and the Coronado Bank, San Diego Trough, and San Clemente faults to the west. To the south, regional faults include Vallecitos, San Miguel and Aqua Blanca faults. *Active faults are defined by the State of California as faults demonstrating surface rupture within the* Holocene Epoch (last 11,000 years). Potentially active faults are defined as having evidence for surface rupture within the Quaternary period.

No portion of the Rose Canyon Zone, or any other fault that is considered active or potentially active by the State of California or by the City of San Diego, has been mapped in the immediate project site vicinity (Figure 5.3-2).

A. Seismic Coefficients

According to the California Building Code (CBC, 1998, edition) the project site is located in Seismic Zone 4, which covers areas previously affected by major historic earthquakes and areas of recent high levels of seismicity, including all of southwestern California (Petra, 2008).

B. Potential Geologic Hazard Zone

According to the City of San Diego Seismic Safety Study Geologic Hazard Maps the project site is located in geologic hazard Zone 53. This zone is defined as: "level or sloping terrain, unfavorable geologic structure, low to moderate risk." The relative risk in geologic zones 53 is considered "low to moderate."

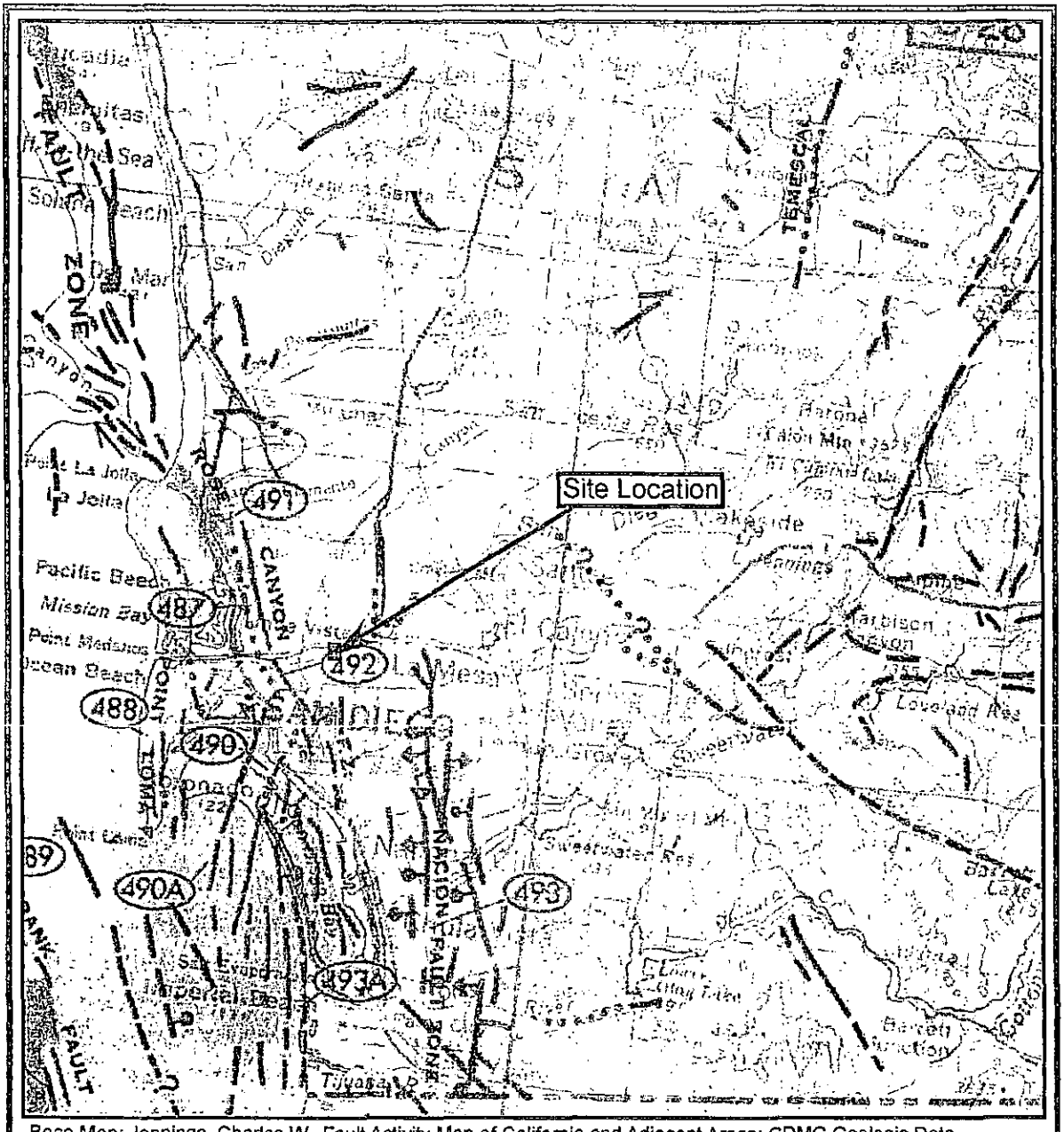
5.3.1.4 Groundwater

Groundwater was not encountered at the site. Based on review of geologic maps and the site visit conducted by Petra, groundwater elevations are likely below anticipated bottoms of existing structures. Localized seepage should not be anticipated during basement (sub-terranean) wall excavations for the *parking structure. Groundwater or seepage depths can be confirmed during subsurface geotechnical* investigation.

5.3.2 Impact Thresholds

According to the City of San Diego's Significance Determination Thresholds, impacts to geologic conditions would be considered significant if the project would:

- *Expose people or structures to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards; and,*
- *Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.*



Base Map: Jennings, Charles W., Fault Activity Map of California and Adjacent Areas; CDMG Geologic Data Map No. 6 (1994).

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REGIONAL FAULT MAP

Academy of Our Lady of Peace Property

DATE: Dec. 2007	J.N.: 431-07
DWG BY: WBS	SCALE: 1" = 21.25 mi.

SOURCE: Petra Geotechnical Inc, 2008

02/05/08

Academy of Our Lady Of Peace

Geological Fault Map

FIGURE 5.3-2

5.3.3 Impacts

Issue 1: Would the proposal expose people or property to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards?

As discussed above, the Rose Canyon fault is the closest known active fault to the project site and is expected to have the greatest effect on the project relative to earthquake ground motions. Several possible potentially active faults, those that have ruptured in the last two million years, lie within several miles from the project site and include the Coronado Bank, Newport-Inglewood, Elsinore (Julian and Temecula segments), Earthquake Valley, and Elsinore (Coyote Mtn. Segment) faults.

The project site will likely be exposed to strong ground motion because the site is located in a seismically active area. The severity of ground shaking will be dependent on several factors, including distance to the epicenter and magnitude of the seismic event. It is likely that the site will experience effects of at least one moderate to large earthquake during the life of the proposed structures. However, standard engineering practices would be incorporated into the design and construction of the proposed development. Seismic design features would be incorporated into the building plans in accordance with the California Building Code (CBC). Also, the school has complied with the City's Unreinforced Masonry (URM) ordinance by retrofitting all the required buildings. Six existing campus buildings were identified as being subject to the ordinance. One had already been retrofitted. One, which had a complete concrete frame, did not need retrofitting. The remaining four were retrofitted, one at a time, during the successive summers of 2002 through 2005. Therefore, the impact associated with strong ground motion would be less than significant.

In addition to direct effects on structures, strong ground shaking from earthquakes can also produce other site effects that include surface fault rupture, soil liquefaction, lateral spreading, seismically induced differential settlement, landsliding, earthquake-induced flooding, seiches, tsunamis. The results of a site-specific evaluation of each of the above possible secondary effects are presented below (Petra, 2008):

Surface Fault Rupture: No active or potentially active faults have been mapped in the immediate project site vicinity. Neither the State nor the City has delineated a zone requiring special studies at the site. Therefore, it is considered very unlikely that surface fault rupture would occur at the project site in the future.

Differential Settlement Due to Seismic Shaking: Differential settlement requires the soil to experience liquefaction. Since the project site is not prone to liquefaction, differential settlement due to seismic shaking is considered to be very low.

Earthquake-Induced Flooding: If a dam or other water-retaining structure fails because of an earthquake, areas downstream from the structure can be flooded. The project site is located at an elevation well above any drainage that could carry flood water. The possibility of flooding at the project site is considered extremely unlikely.

Tsunami: Tsunamis are sea waves produced by submarine earthquakes, landslides, or volcanic eruptions. Based on current available information, and considering the elevation of the portion of the site where development is proposed (approximately 385 feet MSL), the project site is located well inland from areas that might be affected by a tsunami. According to Petra (2008), the risk of a tsunami is almost non-existent.

Seiche: Damage to the project site due to a seiche, a seismic wave setup in a restricted body of water, cannot occur in the project site vicinity because no such bodies of water are present near the site.

Flooding: Review of the Flood Insurance Rate Map (FIRM), Map No. 06073C1619, dated June 19, 1997, indicates that the site is well outside of the 100 and 500-year flood zone.

Issue 2: Would the project result in a substantial increase in wind or water erosion of soils, either on or off the site?

As discussed in Section 5.5, Hydrology/Water Quality of this EIR, the construction of the proposed project would involve grading activities. However, potential erosion impacts that could occur as a result of these grading activities would be reduced to below a level of significance with implementation of erosion control measures.

Issue 3: Would the project be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Landsliding: The proposed classroom building and parking structure sites are located on relatively level terrain; the extreme northern portions of both the east and west sides abut slope edges of tributary canyons of Mission Valley. The geologic reconnaissance and review of aerial photographs did not indicate the presence of landslides on or in the immediate vicinity of the two sites proposed for development. According to Petra (2008) the risk associated with landsliding at the building sites is low. However, given the steep slopes and project location within a "low to moderate" geologic hazard area, a potentially significant impact has been identified. Risks associated with landsliding should be evaluated with a subsurface geotechnical investigation at both proposed development locations. Typical slope maintenance would be required for portions of the property containing slopes. A geologic site stability assessment was prepared to assess the slope stability of the proposed classroom building site and the parking structure site (Petra, 2008). This assessment included subsurface exploration (geotechnical boring). Specifically, one large-diameter boring was drilled at the classroom site in a planter area of the parking lot, adjacent to the top of the slope. Based on this subsurface investigation, the site conditions indicate it has a factor of safety of 1.5, or greater with regards to slope stability at the building sites. The geotechnical investigation (Petra, 2008) indicates that the project site (both classroom building location and parking structure) have a favorable geologic structure and is considered low risk.

Given the steep slopes and project location within Geologic Hazards Category 53, a "low to moderate risk" geologic hazard area, a potentially significant impact has been identified with respect to landsliding as a

portion of the classroom building and the parking structure would encroach into steep slopes. However, with the implementation of Mitigation Measure GS-1, which requires that a detailed subsurface geotechnical investigation shall be performed at both locations proposed for development (the classroom building and the parking structure), will reduce this impact to a level less than significant.

Soil Liquefaction Potential: Liquefaction occurs when loose, saturated, predominantly granular soils are subjected to vibrations such as those associated with earthquakes. The Lindavista Formation underlying the site is relatively dense, and the risk of liquefaction is considered very low to non-existent. The site is not near mapped liquefaction zones shown on the City of San Diego Seismic Safety Maps (1995).

Lateral Spreading: Conditions for liquefaction need to be present for there to be lateral spreading. Therefore, lateral spreading is not applicable to the project site.

5.3.4 Significance of Impacts

Regulatory oversight of the design and construction of the proposed project would ensure there is no significant impact due to geologic conditions at the project site. This includes compliance with the CBC.

Given the steep slopes and project location within Geologic Hazards Category 53, a "low to moderate risk" geologic hazard area, a potentially significant impact has been identified with respect to landsliding as a portion of the classroom building and the parking structure would encroach into steep slopes.

5.3.5 Mitigation Measures

GS-1 As part of project structural design and prior to issuance of a grading permit, a detailed subsurface geotechnical investigation shall be performed at both locations proposed for development (the classroom building and the parking structure) to provide slope stability/landslide evaluation for the slope zone areas and foundation recommendations for the structures. Future recommended borings shall be described in the existing parking lot(s) adjacent to tops of slopes, and not in sensitive open space areas.

5.3.6 Conclusions

The proposed project has the potential to result in impacts due to seismic activity. However, implementation of the CBC standards into the project design would reduce these impacts to below a level of significance. Also, the proposed project has the potential to result in impacts due to landsliding. However, implementation of Mitigation Measure GS-1 would reduce the potential impacts below a level of significance.

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5.4 Historical Resources

An archaeological survey (ASM, March 2008) was prepared by ASM Affiliates for the proposed project and is provided in Appendix D of this EIR. Three historical assessments (Lia, May 2008a; Lia, May 2008b; and Lia, May 2008c) were prepared by the Office of Marie Burke Lia in order to determine the potential historical and architectural significance of the three single-family residences proposed for demolition at 2544 Collier Avenue, 4910 Uvada Place, and 2746 Copley Avenue respectively. These historic reports are provided in Appendices E1, E2 and E3 of this EIR.

5.4.1 Existing Conditions

Environmental Setting

Preshistoric. Archaeological investigations along the southern California coast have indicated that there was a diverse range of human occupation extending from the early Holocene into the Ethnohistoric period. It is most widely accepted that humans first entered North America between 15,000 and 12,000 before present (B.P.). The PaleoIndian Period extends from 12,000-7,500 B.P. and is noted for its distinctive tool kit characterized by fluted points. The Archaic Period is considered to have extended from approximately 8,500 B.P. until 1,300 B.P. This time period is differentiated from the PaleoIndian cultural complex based on a later focus on activities that emphasized marine mollusks, fish, and plant resources. The onset of the Late Preshistoric period in San Diego County is generally considered to have occurred between 1,300 B.P. and 800 B.P. In general, the Late Prehistoric period is characterized by the appearance of small, pressure flaked projectile points indicative of bow and arrow technology, the appearance of ceramics, the replacement of flexed inhumations with cremations, and an emphasis on inland plant food collection and processing.

The people living in southern part of San Diego County at the time of Spanish contact were called the Diegueno, after the mission at San Diego. However, many of the people living in the region were not affiliated with the mission, and the term Kumeyaay has come into common usage to identify the Yuma-speaking people living in the central and southern part of the County. The Kumeyaay people established a rich cultural heritage. A large number of village sites have been identified throughout San Diego County. The diet of the Kumeyaay included both plant and animal foods, and groups residing near Mission Valley could have utilized several ecological niches varying by altitude.

Historic. The founder of modern San Diego was Alonzo Erastus Horton, who arrived in San Diego in 1867. During the 1870's the telephone, telegraph, and electricity arrived in San Diego and the water supply was improved. Throughout the 1880's San Diego experienced a massive real estate boom and expanded physically. According the to Greater North Park Community Plan, "The Greater North Park community traces its development history back to shortly after the turn of the century when land in the vicinity of 30th Street and University Avenue was subdivided ... As residential development continued during the 1920s and 1930s, the area around 30th Street and University Avenue became a thriving business district."

The Sisters of St. Joseph of Carondelet arrived in San Diego in 1882 at the behest of Father Antonio Ubach and founded the Academy of Our Lady of Peace. The Academy moved from its downtown location to the current site in 1925.

5.4.1.1 Archaeological Resources

An archival research conducted at the South Coastal Information Center (SCIC) and the San Diego Museum of Man (ASM, 2008). The results were positive for a one-mile buffer around the project site. The records search also indicated that the project site had not been previously surveyed. The records search indicated that a total of seven (7) archaeological sites are recorded near but not within the project site (the Academy property) (Table 5.4-1) and that the project site had not been previously surveyed.

TABLE 5.4-1
Previously Recorded Archaeological Sites Within One Mile of Project Site

SITE NUMBER	DESCRIPTION	LOCATION
P37-014904	Metavolcanic blade	Alabama Street
P37-014959	Metavolcanic flake	Mission Valley
P37-024342	Adams Avenue Trolley Barn	University Heights
SDI-11055	Locations of broken rock recorded as Pleistocene human occupation areas	Mission Valley
SDI-11056	Recorded as SDM-W-178 by Rogers, this is an obsidian arrowhead and collections of artifacts made by "local collectors"	Mission Valley
SDI-15647	Historic domestic refuse deposit	University Heights
SDI-17543	Historic refuse deposit	University Heights

Source: ASM Affiliates, 2007

ASM Affiliates, Inc. conducted an archaeological survey on approximately 5 acres of land located within the Academy of Our Lady of Peace property in 2007. The survey included field reconnaissance at the project site. The two areas in the vicinity of proposed improvements were surveyed. These included in the area of the existing paved parking lots and residential buildings with landscaped yards and small, exposed open areas; however, overall visibility was poor.

No archaeological sites were found within the project site as a result of the field survey. Although buried sites would likely have been previously disturbed as the majority of the project site has been graded and developed, the current project could encroach into areas not previously disturbed and monitoring during initial grading was recommended as a mitigation measure (ASM, 2008).

5.4.1.2 Historical Resources

The proposed project would involve the demolition of three single family buildings owned by the Academy, on the project site, (2544 Collier Avenue, 2746 Copley Avenue and 4910 Uvada Place). Construction of a two-story classroom building (21,509 square feet) would require demolition 2544 Collier Avenue; and construction of a two-level parking structure (consisting of one subterranean level, and one at-grade level) would require the demolition of 2746 Copley Avenue and 4910 Uvada Place. Historical assessments were prepared for each of the three residences proposed to be demolished (Lia, 2008). These assessments are provided in Appendices E1, E2, and E3 of this EIR. No structures within the existing operating campus of the Academy of Our Lady of Peace would be demolished or substantially altered.

A. 2544 Collier Avenue

Figure 5.4-1 shows the structure located at 2544 Collier Avenue. 2544 Collier Avenue is a Spanish Eclectic style, single-family residence constructed in 1931. The building is a one- and two-story, irregularly shaped, asymmetrical, Spanish Eclectic style residence located on a narrow lot at the very edge of the canyon. The building has a concrete foundation, stucco exterior, and mixed gabled roof with Spanish tile. The main entrance is accessed via an open porch area and a balcony with a wrought iron railing and tile detailing is present over the main entrance door. The Residential Building Record indicates that the structure and garage were constructed in ca. 1931.

The interior of the home contains three bedrooms, three baths with an entry hall, living room, library, formal dining room, breakfast room, kitchen, pantry and greenhouse.

The building is considered to be significant as is possesses high artistic values and construction consistent with the characteristics of the type, period, or method of the Spanish Eclectic style of architecture (Lia, 2008). Specifically, this building is eligible as a San Diego Historic Site under Criterion C as a good example of Spanish Eclectic architecture. It is not eligible under other City of San Diego Criteria (A, B, D, E, or F), the California Register of Historical Resources under Criteria 1,2,3, or 4, or the National Register of Historic Places under Criteria A, B, C, or D. As discussed under "Impacts," historical HBAS level documentation would be required before demolition (see Mitigation Measure H-2); the building does not possess any potential for further information (Lia, 2008). The historical report indicates that the building is not considered to be historically significant as the building was not associated with individuals significant at the local, state or national levels.

B. 4910 Uvada Place

Figure 5.4-2 shows the structure located at 4910 Uvada Place. This structure was constructed in 1928. The building is a one- and two-story, irregular shaped, asymmetrical, Spanish Eclectic style, single-family residence. The building has a concrete foundation, stucco exterior and a flat roof and a gabled roof with Spanish tile.

The building is not considered to be architecturally significant as an example of the Spanish Eclectic style of architecture as it does not possess high artistic values and retains/contains few of the distinctive

1. **2544 Collier Avenue**
   View North/South and West Facades
   December 2006

2. **2544 Collier Avenue**
   View North/South and West Facades
   December 2006

SOURCE: Office of Marie Burke Lia, 2006

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Academy of Our Lady of Peace

Photos of 2544 Collier Avenue

FIGURE 5.4-1

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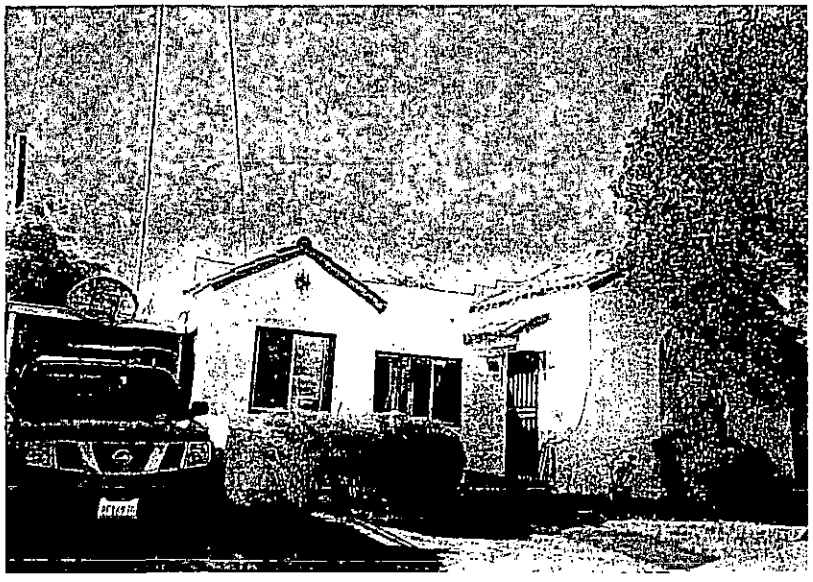
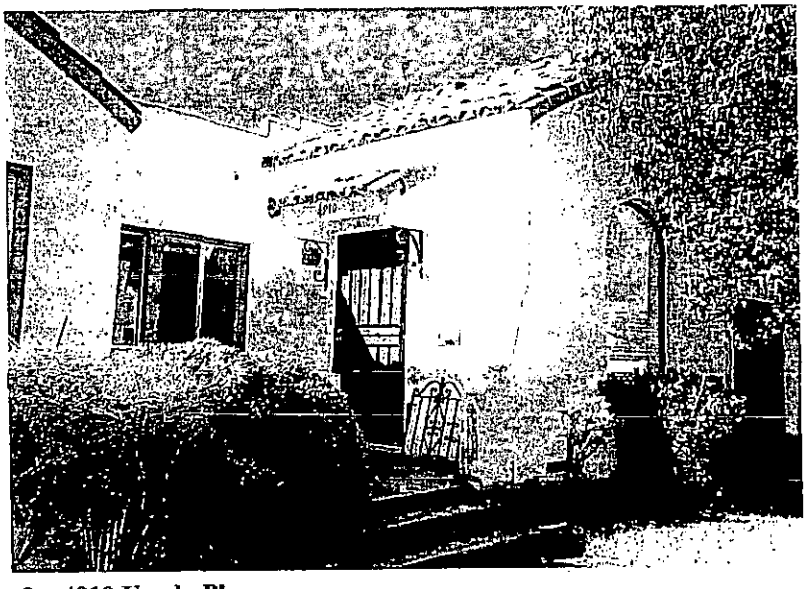


1. 4910 Uvada Place
View West/East Facade
December 2006



2. 4910 Uvada Place
View West/East Facade
December 2006

SOURCE: Office of Marie Burke Lia, 2006

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BRG CONSULTING INC

Academy of Our Lady of Peace

Photos of 4910 Uvada Place

FIGURE 5.4-2

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characteristics of this type, period, or method of construction. The majority of the original wood framed windows have been replaced with aluminum slider style windows. A laundry room was attached to the side of the garage and a carport was added to the driveway area. The building does not exemplify or reflect special elements of San Diego's historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping, or architectural development. It is not identified as being associated with persons or events of historical significance and is not a valuable example of the use of indigenous materials or craftsmanship. Further, it does not embody the distinctive characteristics of a style, type, period, or method of Spanish Eclectic construction.

This building is not eligible under any City of San Diego Criteria (A, B, C, D, E, or F), the California Register of Historical Resources under Criteria 1,2,3, or 4, or the National Register of Historic Places under Criteria A, B, C, or D.

The building does not possess any further information potential (i.e., associated important persons etc.) (Lia, 2008).

C. 2746 Copley Avenue

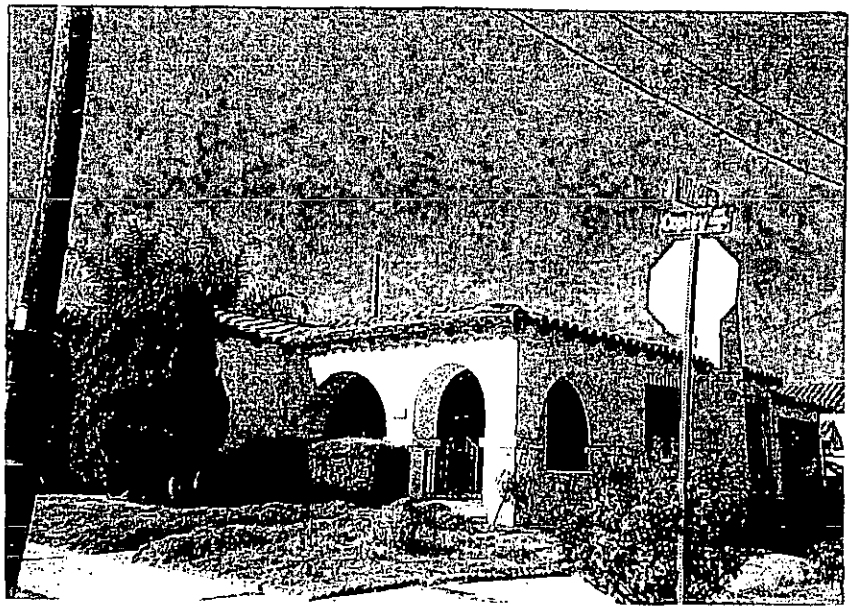
Figure 5.4-3 shows the structure located at 2746 Copley Avenue. This structure was constructed in 1929. The building is a one-story, rectangular-shaped, asymmetrical, Spanish Eclectic-style, singe-family residence. The building has a concrete foundation, stucco exterior and a flat roof and a mixed gable roof with Spanish tile. No details of the interior of the house were available.

Historical research indicates that the building is not considered to be historically significant as the building was not associated with individuals significant at the local, state or national levels. However, the building is considered to be architecturally significant as an example of the Spanish Eclectic style of architecture and meets City of San Diego Criterion C. The building contains some of the distinctive characteristics of a type, period, or method of Spanish Eclectic construction. HABS documentation would also be required prior to demolition (see "Impacts" discussion); however, the building does not possess any further information potential (Lia, 2006b).

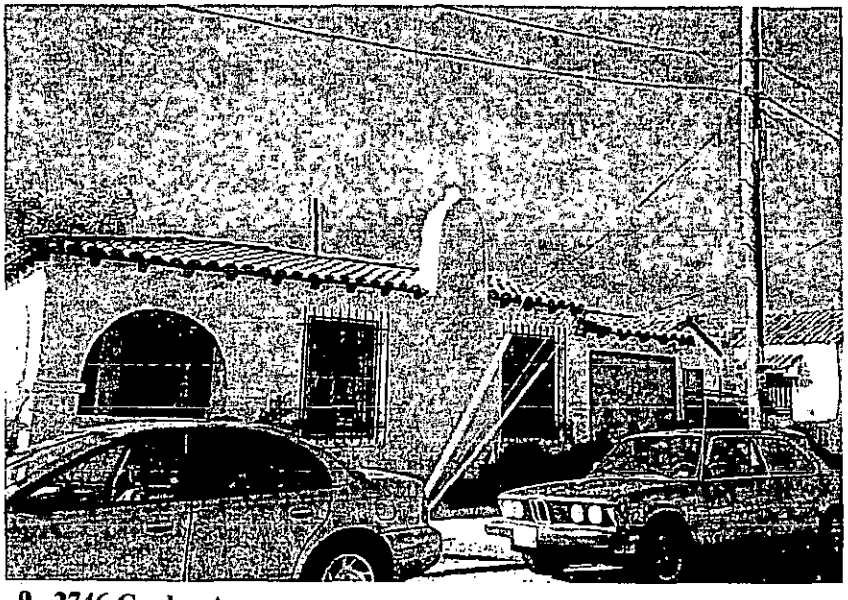
This building is not eligible under any City of San Diego Criteria (A, B, D, E, or F), the California Register of Historical Resources under Criteria 1,2,3, or 4, or the National Register of Historic Places under Criteria A, B, C, or D.

5.4.2 Impact Thresholds

The purpose and intent of the Historical Resources Regulations of the Land Development Code (City of San Diego, 2001) is to protect, preserve and, where damaged, restore the historical resources of San Diego. The regulations apply to all proposed development within the City of San Diego when historical resources are present on the premises. The Historical Resources Regulations pertain to historical resources that meet the definitions contained in Chapter 11, Article 3, Division 1 of the Code. The following are used by the City of San Diego for a determination of significance for a historical resource: the National Register of Historic Places, California Environmental Quality Act (CEQA), City of San Diego Progress Guide and General Plan,



1. 2746 Copley Avenue
View Northwest/South and East Facades
December 2006



9. 2746 Copley Avenue
View Northwest/East Facade
December 2006

SOURCE: Office of Marie Burke Lia, 2006

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BRG CONSULTING INC

Academy of Our Lady of Peace

Photos of 2746 Copley Avenue

FIGURE 5.4-3

P:\projects\635 Academy of Our Lady of Peace\Figure 5.4-3 Copley Ave ai

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City of San Diego Historical Resources Register, and the City of San Diego CEQA Significance Determination Guidelines (City of San Diego, 2007).

According to the City of San Diego's Significance Determination Guidelines, a significant historic resource is one which qualifies for the California Register of Historical Resources or is listed in a local historic register or deemed significant in a historical resource survey, as provided under §5024.1 (g) of the Public Resources Code. A resource that is not listed in, or determined to be ineligible for listing in, the California Register of Historic Resources, not included in a local register of historic resources, or not deemed significant in a historical resource survey may nonetheless be historically significant for purposes of CEQA.

The determination of Significance of Impacts on Historical and Unique Archaeological resources is based on the criteria found in §15064.5 of the State CEQA Guidelines. §15064.5 clarifies the definition of a substantial adverse change in the significance of a historical resource as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired." Further, a resource is "materially impaired" if it is demolished or materially altered.

According to the City of San Diego's Significance Determination Thresholds (January 2007), impacts to cultural resources would be considered significant if the project would:

- *Result in the alteration or destruction of a prehistoric archaeological site;*
- *Result in any adverse physical or aesthetic effects to a prehistoric or historic building, structure, object, or site; and/or,*
- *Result in any impact to existing religious or sacred uses within the potential impact area.*

All components of development must be considered in evaluating potential impacts to historical resources. As such, the City's Significance Determination Thresholds also identifies that an Area of Potential Effect (APE) includes the area of both direct and indirect impacts. Direct impacts generally result from activities that will cause damage to or have an adverse effect on the resource including, but not limited to, such activities as grading, road and utility construction, staging areas, and demolition and excavation. Indirect impacts, in the built environment, include the introduction of visual, audible, or atmospheric effect that are out of character with the historic property or alter its setting, when the setting contributes to the property's significance. For archaeological resources and traditional cultural properties, indirect impacts are often the result of increased public accessibility to resources not otherwise subject to impacts which may result in an increased potential for vandalism and site destruction.

According to the City's Significance Determination Thresholds, cumulative archaeological resource impacts may include the loss of a historical resource database due to mitigation by data recovery. In the built environment, cumulative impacts most often occur to districts, where several minor changes to contributing properties, their landscaping, or to their setting over time could result in a significant loss of integrity to the district as a whole.

5.4.3 Impacts

Issue 1: Would the proposed project result in the alteration or destruction of a prehistoric or historic archeological site or religious or sacred uses within the site?

5.4.3.1 Archaeological Resources

No archaeological sites were identified within the project site as a result of the field survey (ASM, 2007). Archaeological sites were found in the vicinity of the project site based on the records search. Visibility of the ground surface was almost zero due to paving and existing development on the areas proposed for the classroom building and parking structure. There is a potential that buried archaeological resources may be encountered during grading. Therefore, a potentially significant impact to archaeological resources has been identified. Implementation of Mitigation Measure HR-1 monitoring would reduce the potential impact to archaeological resources below a level of significance. Should archaeological resources be encountered during construction, appropriate data recovery would be implemented.

5.4.3.2 Native American Consultation

The Native American Heritage Commission (NAHC) was contacted to request information on sacred and traditional lands on December 6, 2007 related to the proposed project. A letter from NAHC was received, indicating that their files did not contain any information about cultural resources within the project area. The NAHC recommended that individuals be contacted who might have knowledge about traditional or cultural sites in the project area. These groups and individuals were contacted by letter on December 12, 2007. One response was received from Clint Linton of Santa Ysabel which recommended Native American monitoring for the project. Should any suspected Native American remains be found, the processes outlined in Public Resources Code 5097.98 would be implemented.

Issue 2: Would the proposal result in adverse physical or aesthetic effects to a prehistoric or historic building, structure, object, or site?

5.4.3.3 Historical Resources

As resources, which are architecturally significant under CEQA, the 2544 Collier Avenue and 2746 Copley Avenue properties are considered to be eligible for listing in the California Register of Historical Resources, the California Historic Resources Inventory, the National Register of Historic Places, or the San Diego Historical Resources Board Register. Therefore, demolition or moving of these residences would have a potentially significant impact on Cultural Resources. Implementation of Mitigation Measure HR-2 would reduce the impact to the extent feasible; however, the impact would remain significant and unmitigable.

The Board of Directors of The Academy of Our Lady of Peace adopted a solution of financial hardship pertaining to a religious exemption of Academy of Our Lady of Peace property from designation as a local historical resource pursuant to Government Code Section 37361. Therefore, 2544 Collier Avenue and 2746 Copley Avenue properties are not, or would not be listed in the City's, or other historical register; however, disclosure of the impacts is required under CEQA.

Section 9.0 Alternatives of this EIR provides an analysis of potential alternatives to the proposed project that would reduce or eliminate all impacts to historical resources.

A. 2544 Collier Avenue

The residence at 2544 Collier Avenue is eligible as a San Diego Historical Site under Criterion C (U.S. Department of the Interior, 1986:1, see page 40 of the City's CEQA Significance Determination Thresholds January 2007) for its representation of Spanish Eclectic architecture.

The loss the 2544 Collier Avenue is considered a significant impact under CEQA. Mitigation Measure HR2 would reduce the impact the extent feasible; however, the impact would remain significant and unmitigable, because a substantial adverse change would still result and the completion of HABs documentation would not be considered as mitigating the resource to a level less than significant.

B. 4910 Uvada Place

The 4910 Uvada Place building is not considered to be a significant historic resource under CEQA. The structure is not architecturally significant as an example of the Spanish Eclectic style and does not possess high artistic values associated with this style. The building is not associated with individuals significant at the local, state, or national levels, nor does the building possess any further informational potential.

As a resource which is not historically or architecturally significant under CEQA, the property is not considered to be eligible for listing in the California Register of Historical Resources, the California Historic Resources Inventory, the National Register of Historic Places, or the San Diego Historical Resources Board Register. Therefore, demolition of this property would not result in an impact to historical resources.

C. 2746 Copley Avenue

The residence at 2746 Copley Avenue is eligible as a San Diego Historical Site under Criterion C for its representation of Spanish Eclectic architecture. The physical demolition or moving of 2746 Copley Avenue, a significant historic resource, will result in a significant impact on Cultural Resources under CEQA. Implementation of Mitigation Measure HR-2 would reduce the impact to the extent feasible; however, following completion of Mitigation Measure HR-2 (i.e., regardless of HABs documentation), the loss of the structure to demolition and this impact would still be considered significant and unmitigated under CEQA, because a substantial adverse change would still result and the completion of HABs documentation and/or relocation would not be considered as mitigating the resource loss to a level less than significant.

Section 9.0 Alternatives of this EIR provides an analysis of potential alternatives to the proposed project that would reduce or eliminate this impact to historical resources.

5.4.4 Significance of Impacts

Archaeological Resources. There is potential that buried archaeological resources not visible at the surface may be encountered during grading. A potentially significant impact to archaeological resources has been identified.

Historical Resources. Of the three subject resources to be demolished by the proposed project, two of the buildings (2544 Collier Avenue and 2746 Copley Avenue) have been found potentially eligible for individual local, historic listing under local historical resource criteria and architecturally significant under CEQA. Therefore, implementation of the proposed project would create significant direct and likely unmitigable impacts which could not be reduced to below a level of significance under CEQA to both the 2544 Collier Avenue and 2746 Copley Avenue properties.

5.4.5 Mitigation Measures

PRIVATE PROJECTS (DATED 6/3/08)
HISTORICAL RESOURCES (ARCHAEOLOGY)

HR-1 I. Prior to Permit Issuance

A. *Entitlements* Plan Check

1. Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for Archaeological Monitoring and Native American monitoring have been noted on the appropriate construction documents.

B. Letters of Qualification have been submitted to ADD

1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.
2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project.
3. Prior to the start of work, the applicant must obtain approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to MMC that a site specific records search (1/4 mile radius) has been completed. Verification includes, but is not limited to a copy of a confirmation letter from South Coast Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
3. The PI may submit a detailed letter to MMC requesting a reduction to the _ mile radius.

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B. PI Shall Attend Precon Meetings

1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.
   a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.
2. Identify Areas to be Monitored
   a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits.
   b. The AME shall be based on the results of a site specific records search as well as information regarding existing known soil conditions (native or formation).
3. When Monitoring Will Occur
   a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
   b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. Monitor(s) Shall be Present During Grading/Excavation/Trenching

1. The Archaeological Monitor shall be present full-time during grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The Native American monitor shall determine the extent of their presence during construction related activities based on the AME and provide that information to the PI and MMC. **The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities.**
2. The monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (**Notification of Monitoring Completion**), and in the case of ANY discoveries. The RE shall forward copies to MMC.

3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered may reduce or increase the potential for resources to be present.

B. Discovery Notification Process

1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.
2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.

C. Determination of Significance

1. The PI and Native American monitor shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below.
   a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required.
   b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.
   c. If resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.

IV. Discovery of Human Remains

If human remains are discovered, work shall halt in that area and the following procedures as set forth in the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:

A. Notification

1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior Planner in the Environmental Analysis Section (EAS).
2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.

B. Isolate discovery site

1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenience of the remains.

2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenience.
3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin.

C. If Human Remains **ARE** determined to be Native American
1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, **ONLY** the Medical Examiner can make this call.
2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.
3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with the California Public Resource and Health & Safety Codes.
4. The MLD will have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods.
5. Disposition of Native American Human Remains shall be determined between the MLD and the PI, IF:
   a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being notified by the Commission; OR;
   b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner.
   c. In order to protect these sites, the Landowner shall do one or more of the following:
      (1) Record the site with the NAHC;
      (2) Record an open space or conservation easement on the site;
      (3) Record a document with the County.
   d. Upon the discovery of multiple Native American human remains during a ground disturbing land development activity, the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures the human remains and buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 5.c., above.

D. If Human Remains are **NOT** Native American
1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial.
2. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC 5097.98).

3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with MMC, EAS, the applicant/landowner and the Museum of Man.

V. Night and/or Weekend Work

A. If night and/or weekend work is included in the contract

1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
2. The following procedures shall be followed.
   a. No Discoveries
      In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSVR and submit to MMC via fax by 8AM of the next business day.
   b. Discoveries
      All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction, and IV – Discovery of Human Remains.
   c. Potentially Significant Discoveries
      If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed.
   d. The PI shall immediately contact MMC, or by 8AM of the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.

B. If night and/or weekend work becomes necessary during the course of construction

1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
2. The RE, or BI, as appropriate, shall notify MMC immediately.

C. All other procedures described above shall apply, as appropriate.

VI. Post Construction

A. Preparation and Submittal of Draft Monitoring Report

1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring.
   a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report.

b. Recording Sites with State of California Department of Parks and Recreation
The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.

2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
4. MMC shall provide written verification to the PI of the approved report.
5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Artifacts
1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued
2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.
3. The cost for curation is the responsibility of the property owner.

C. Curation of artifacts: Accession Agreement and Acceptance Verification
1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable.
2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.

D. Final Monitoring Report(s)
1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.

2. The RE shall, in no case, issue the Notice of Completion and/or release of the Performance Bond for grading until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

HR-2 **A – HABS Mitigation** - Prior to the issuance of a demolition permit for relocation proceedings for each individual structure, historical documentation of 2544 Collier Avenue and 2746 Copley Avenue shall be completed. This would include the following:

- Historic American Building Survey (HABS) Level I documentation for both properties; and,
- Completion of California Department of Parks and Recreation 523 forms (523A – Primary Record and 523 B Building, Structure, Object Record) for both properties.

Documentation of the properties is to be completed by an individual or consultant who meets the *Secretary of the Interior's Standards for Professional Qualifications Standards* (36 CFR Part 61) in architectural history, history, or architecture.

Completion of California Department of Parks and Recreation Primary Record (DPR 523A-test) and Building Structure and Object Record (DPR 523B-test) for both houses (2544 Collier Avenue and 2746 Copley Avenue).

All of these records are to be completed by a qualified architectural historian or historic architect. A qualified architectural historian or historic architect is an individual who meets the Secretary of Interior's minimum professional qualifications in education and experience for architectural history or historic architecture.

5.4.6 Conclusions

There is the potential that buried archaeological resources not visible at the surface may be encountered during grading. A potentially significant impact to archaeological resources has been identified. Mitigation Measure HR-1 would reduce this impact to a level less than significant.

The demolition of two historic buildings, 2544 Collier Avenue and 2746 Copley Avenue, is considered a significant impact. These two significant historic buildings proposed to be demolished as a result of the project. Mitigation Measure HR-2 A and B would reduce the impact to the extent feasible; however, remaining impacts would likely constitute a substantial change and would still likely be considered significant and unmitigable under CEQA.

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5.5 Hydrology/Water Quality

Information contained in this section is summarized from the *Water Quality Technical Report* (Civil Consulting Group, Inc., December 12, 2007) *and the Preliminary On-Site Drainage Study for the Academy of Our Lady of Peace* (Civil Consulting Group, Inc., September 5, 2007). These documents are provided in Appendix F and Appendix G of this EIR.

5.5.1 Existing Conditions

5.5.1.1 Surface Hydrology

A. Regional Surface Hydrology

The project site is located within the San Diego Drainage basin. For regulatory purposes, the California Regional Water Quality Control Board (RWQCB) has divided the San Diego Drainage Basin into 11 Watershed Management Areas. The site is part of the San Diego watershed (Hydrologic Unit 907.10). The San Diego watershed is a triangular-shaped area of about 60 square miles with no major stream system. It is bordered to the north by the watershed of the San Diego River and on the south, in part, by the Sweetwater River. The major population center is the City of San Diego. The unit is relatively dry with an annual precipitation amount of less than 11 inches to 13 inches. The San Diego Hydrologic Unit is comprised of the following four hydrologic areas; the Lower San Diego, San Vicente, El Capitan, and Boulder Creek Hydrologic Areas (RWQCB, 1994). The project site is located within the Lower San Diego Hydrologic Area (907.10). Furthermore, the project site is located within the Mission San Diego Hydrologic Subarea (907.11).

B. Local Hydrology

A majority of the project site that is proposed for development of the parking structure and classroom building is flat and currently developed with urban uses and impervious surfaces. Runoff from the project site is currently collected in a series of gutters and drainage pipes, which flow to the public storm drain system located within the public right-of-way of adjacent streets.

5.5.1.2 Water Quality

A. Drainage Patterns

Proposed Classroom Site

The existing pad has a grade difference of approximately 2-feet and has a general northeast to southwest sloping grade. Under existing conditions, the drainage currently flows overland onto the public street gutter and to a D-25 sidewalk underdrain located at Collier Avenue which eventually discharges into a public storm drain system curb inlet located on the west side of the project. Approximately 0.08 acres currently flows overland north of the project site to a descending slope into Mission Valley.

Proposed Parking Structure Site

The proposed parking structure site has an elevation difference of approximately 2-feet. The existing parking lot area has a general northeast to southwest sloping grade. The drainage currently flows overland onto the public street gutter through a D-25 sidewalk underdrain located at Copley Avenue which eventually discharges into a public storm drain system curb inlet located on the west side of the project and to an existing on-site stormdrain, which in turn discharges to the canyon located west of the project. Approximately 0.16 acres currently flows overland to the east public gutter onto a catch basin located on the northwest corner of Uvada Place.

The collective drainage from both sites eventually discharges into a downstream catch basin that filters the water and then discharges the water into the San Diego River and to the Pacific Ocean, which is located approximately six miles from the subject site. The Lower San Diego River at the rivermouth to the Pacific Ocean is listed on the Clean Water Act Section 303(d) List of Water Quality Limited Segments for the following state impairments: fecal coliform, low dissolved oxygen, phosphorus, and total dissolved solids SWRCB, 2006).

B. Rainfall Runoff Characteristics

Under existing conditions, the proposed classroom project site generates approximately 1.93 cubic feet per second (CFS) (100 year 24-hour event) of storm water runoff. The proposed parking garage project site generates approximately 2.23 CFS (100 year 24-hour event) of storm water runoff.

Under the proposed conditions, the proposed classroom project site would generate approximately 2.27 CFS (100 year 24-hour event). The proposed parking structure project site would generate 3.40 CFS (100 year 24-hour event) of storm water runoff. Storm water runoff at the proposed classroom and parking structure project sites would increase from 0.34 CFS and 0.54 CFS respectively.

C. Downstream Conditions

The project site is located approximately eight miles upstream from the Pacific Ocean and the downstream watershed is the Lower San Diego Unit (907.1). The discharge from the project site outlet points should have minimal influence on water quality in nearby coastal areas near the San Diego River outlet point located at Ocean Beach and waters further south, because the proposed project would be designed so surface water generated from the site would be physically clarified through the use of selected Best Management Practices (BMPs) before it is directed to the public and private storm drain system. As one of the primary BMP features of the proposed project, the drainage would flow over grassy swales prior to discharging onto the existing stormdrain system at the west side and to the street gutter at the northeast corner of the site.

5.5.1.3 Groundwater

Groundwater is defined as water that occurs below the ground surface and occupies open-pore spaces, voids, and fractures in sediment and rock. Any rock or sediment that is water-bearing and that yields economical quantities of water to wells and springs is referred to as an aquifer. One or more aquifers composed primarily of unconsolidated deposits found in valleys of major rivers and streams are generally

defined as groundwater basins. A hydrologic unit is the designation given by State Water Regional Control Board (SWRCB) to define groundwater basins using surface drainage divides (highlands) to classify total watershed areas, including water-bearing and non-water-bearing formations.

According to Section 5.3, Geology/Soils of this EIR, groundwater was not encountered in the geotechnical investigation (Petra Geotechnical, 2008). The project site is located more than 250 feet above the floor of Mission Valley. Considering the coarse-grained nature of the conglomerate beds underlying the site, it is not likely that substantial groundwater is present within the upper 50 feet below the project site.

5.5.1.4 Existing Regulations

The proposed project is required to be consistent with the Municipal Storm Water National Pollution Discharge Elimination System (NPDES) Permit (Municipal Permit) (Order 2001-01 and NPDES No. CAS 0108758), issued on February 21, 2001 to the City of San Diego by the San Diego RWQCB. This Municipal Permit requires the development and implementation of storm water pollution best management practices (BMPs), both during construction and in projects' permanent designs, to reduce pollutants discharged from the project site, to the maximum extent practicable. To address pollutants that may be generated from the new development once the site is in use, the Municipal Permit further requires that the City implement a series of permanent BMPs described in the Model Standard Urban Storm Water Mitigation Plan (SUSMP), which is contained in the City's Storm Water Standards manual and was approved by the RWQCB on June 12, 2002. The City's Storm Water Standards manual was prepared by the Development Services Department of the City San Diego in accordance with the City's Storm Water Pollution Prevention Program (Storm Water Program), a division of the Metropolitan Waste Water Department (MWWD). The Storm Water Standards manual is intended to provide information on how to comply with all of the City's permanent and construction storm water BMP requirements, including the Model SUSMP, for private and public development projects in the City of San Diego.

In addition, the proposed project would adhere to the new Municipal Permit, Order No. R9-2007-0001, issued by the San Diego RWCQB on January 24, 2007 and effective January 25, 2008, which renews the National Pollutant Discharge Elimination System (NPDES) Permit No. CAS0108758 that was first issued on July 16, 1990 (Order No. 90-42), and renewed on February 21, 2001 (Order No. 2001-01). The proposed project would be required to be consistent with the requirements of the new Municipal Permit. Under the new Municipal Permit Requirements, the water quality and hydrology of the project site would be altered in a positive way because stormwater would need to be dealt with on the site rather than completely draining into the City's storm water system.

Furthermore, for the construction of any project that disturbs more than one acre of land, the applicants for the proposed projects are required to enroll in the State Water Resources Control Board (SWRCB) Order No. 99-08-DWQ, of the NPDES General Permit No. CAS000002, Waste Discharge Requirements for Discharges of Storm Water Permit through the City of San Diego. In compliance with the NPDES General Permit, the City's Storm Water Program requires any projects with a NPDES General Permit to prepare a Storm Water Pollution Prevention Plan (SWPPP) for an industrial or construction activities.

5.5.2 Impact Thresholds

According to the City of San Diego's Significance Determination Thresholds, impacts to hydrology and water quality would be considered significant if the project would:

Hydrology:

- *Result in increased flooding on- or off-site;*
- *Grade, clear, or grub more than 1.0 acre of land, especially into slopes over a 25 percent grade, and would drain into a sensitive body or stream;*
- *Result in decreased aquifer recharge; or*
- *Result in modifications to existing drainage patterns.*

Water Quality:

- *Discharge into receiving waters within Environmentally Sensitive Lands or waterbodies listed on the Regional Water Quality Control Board 303(d) Impaired Water Body List; and/or*
- *Conflict with the City of San Diego Stormwater Standards.*

5.5.3 Impacts

Issue 1: Would modifications to the natural drainage system be required for implementation of the project? Would these modifications result in direct or cumulative impacts related to increased flooding or erosion?

The project does not propose development or activities that would result in any alteration of any hydrologic features or drainages within the San Diego Hydrologic Unit. The proposed project would be constructed on relatively flat terrain. Improvements for both sites would require that a total of approximately 0.8 acres of land area be regraded in order to prepare a finish grade for the proposed classroom and parking structure. This minor grading would not alter the existing topography such that drainage patterns or hydrological conditions are affected. The project would not disturb over one acre of land, including only minimal encroachment into steep slopes, and would not drain directly into a sensitive water body or stream.

Issue 2: Would the proposal result in an increase in impervious surfaces or substantial alteration of on- and off-site drainage patterns affecting the rate and volume of surface runoff?

A. Hydrology

Proposed Classroom Site

Under the proposed conditions, the project would increase the amount of impervious surfaces on-site. The majority of the on-site runoff would be directed toward the existing D-25 sidewalk underdrain. The majority

of the existing undeveloped slope area at the north end of the classroom site would maintain the existing drainage area and drainage patterns. The drainage from the developed area would be directed to Collier Avenue via on-site drainage improvements. The proposed flow from the developed site would increase from a cumulative 1.93 CFS to at approximately 2.04 CFS at the south end of the site and 0.23 (2.27 cumulatively) to the north end of the site.

The proposed on-site drainage improvements include a combination of sheet flow over vegetated swale areas, and the installation of valley gutters, slot drains and standard sidewalk underdrains as part of site development. Figure 5.5-1 depicts the location of the proposed vegetated swale BMP for the classroom building.

As part of the planned onsite stormwater management system and proposed as a BMP, the drainage flow would be directed over grassy swales prior to discharging into the street gutter at the south side of the classroom site. This collected drainage flows into the main stormdrain located west of the project site.

The proposed project would not add significant amounts of runoff to the overall storm drainage system and the additional drainage flow would not significantly contribute to downstream reduction of existing drainage pipe capacities. There are no anticipated impacts to adjacent properties or downstream drainage systems. Therefore, no impact has been identified for this issue area.

Proposed Parking Structure Site

Under the proposed conditions, the parking structure would increase the amount of impervious surfaces on-site. A portion of the drainage from the developed area would be directed along a grassy swale to Uvada Place. Under the proposed project, the flow would increase from a cumulative 2.86 CFS to 3.40 CFS. Approximately 2.61 CFS would drain into the existing stormdrain system located west of the project site and 0.79 CFS would drain to the east of the site to Uvada Place.

The on-site drainage improvements for the parking structure include a combination of sheet flow that would be directed over vegetated areas, stormdrains, slot drains and a sump pump located in the subterranean level of the garage. Figure 5.5-2 depicts the location of the proposed vegetated swale BMP for the parking structure. The proposed project would not add significant amounts of drainage to the overall system and the additional drainage would not significantly contribute to downstream reduction of existing pipe capacities. There are no anticipated impacts to adjacent properties or downstream drainage systems. Therefore, no impact has been identified for this issue area.

B. Water Quality

Issue 3: Would the proposal result in an increase in pollutant discharge to receiving waters during or following construction? Would the proposal discharge identified pollutants to an already impaired body of water?

As discussed above, the collective drainage from both sites eventually discharges into a downstream catch basin that filters the water and then discharges the water into the San Diego River and to the Pacific

Ocean, which is located approximately six miles from the subject site. The Lower San Diego River at the rivermouth to the Pacific Ocean is listed on the Clean Water Act Section 303(d) List of Water Quality Limited Segments for the following state impairments: fecal coliform, low dissolved oxygen, phosphorus, and total dissolved solids (SWRCB, 2006).

During construction there is the potential for pollutants associated with construction activity, including sediment from erosion of soils, petroleum products (oil and grease), hazardous materials, and trash to enter the storm drainage system as a result of a storm event.

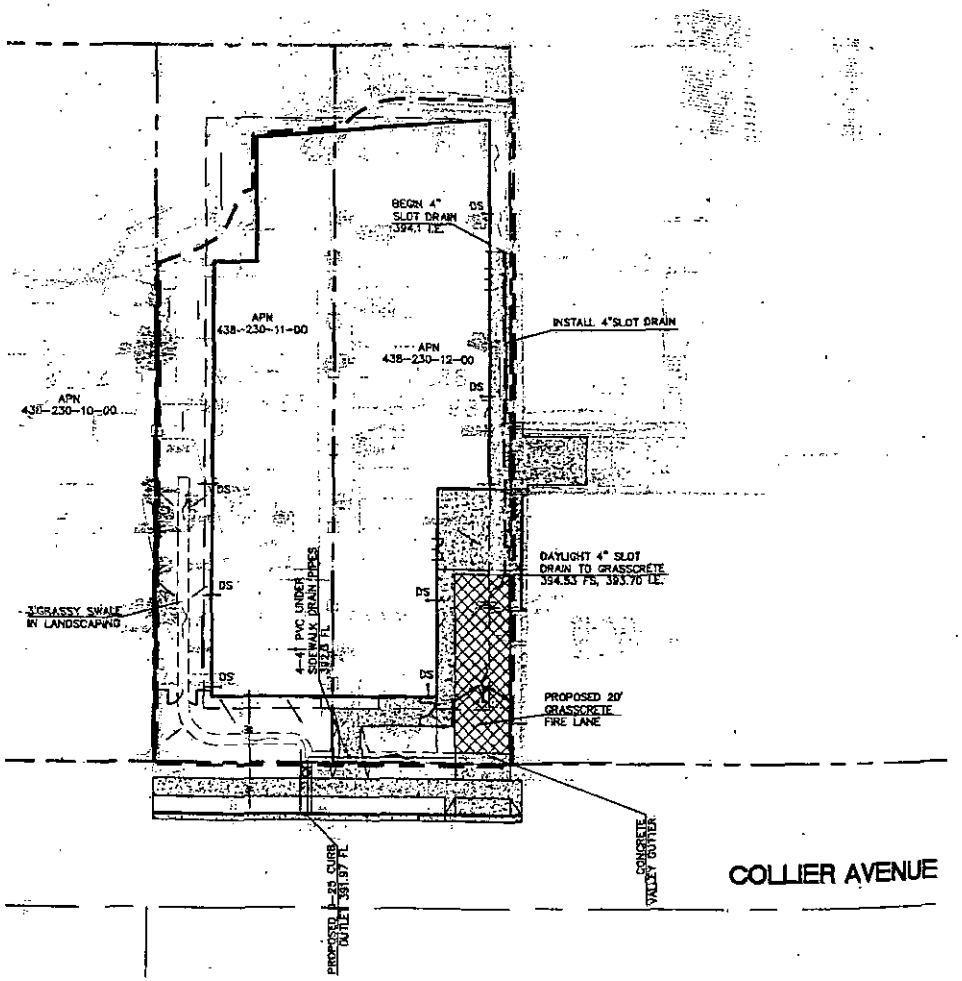
As described in Section 5.5.1.4 above, management of surface water and prevention of pollution of surface water is mandated and enforced under state and federal law, and enforced by the RWQCB and City of San Diego. A Water Quality Technical Report was prepared for the project (Civil Consulting Group, Inc., December 12, 2007) and a Storm Water Pollution Prevention Plan (SWPPP) would be prepared for the construction phase of the proposed project pursuant to the federal NPDES, and submitted to the RWQCB under the NPDES General Permit, adopted by the State Water Resources Control Board (SWRCB).

During construction, BMPs such as desilting basins, silt fences, sand bags, fiber rolls, and other erosion control measures may be employed consistent with the NPDES SWPPP. The objectives of the SWPPP are to:

- Identify all pollutant sources, including sources of sediment that may affect the water quality of storm water discharges associated with construction activity from the construction site;
- Identify non-storm water discharges;
- Identify, construct, implement in accordance with a time schedule, and maintain BMPs to reduce or eliminate pollutants in storm water discharges and authorized non-storm water discharges from the construction site during construction; and,
- Develop a maintenance schedule for BMPs installed during construction designed to reduce or eliminate pollutants after construction is completed (post-construction BMPs).

The Water Quality Technical Report (Civil Consulting Group, Inc., December 12, 2007) identifies the following potential construction BMP's for the project. These are directed specifically at the potential pollutants associated with the classroom building and the parking structure. These include construction scheduling, preservation of existing vegetation, minimizing disturbance and vegetative buffer strips, silt fences, stockpile management, solid waste management, stabilized construction entrance/exit, vehicle and equipment maintenance, gravel bag barrier, material delivery and storage, spill prevention and control, concrete waste management, water conservation practices, and stabilization of disturbed areas. A more detailed description of the construction BMPs would be developed and shown on the precise project grading plans that would be reviewed and approved by the City Engineering Department.

Because the proposed project would ultimately discharge runoff into the San Diego River, which is an existing impaired waterbody, impacts to water quality are considered significant. However, with compliance with the requirements of the SWRCB and the NPDES General Permit process as applicable, this impact would be reduced to a level less than significant.



LEGEND:	SYMBOL
ITEM	SYMBOL
EXISTING STORM DRAIN	
EXISTING CATCH BASIN	
NEW GRASSY SWALE	
NEW DRAINAGE PATH	
NEW STORM DRAIN	
NEW DOWN SPOUT W/FILTER	DS
NEW CONCRETE SIDEWALK	
LIMITS OF GRADING	

SOURCE: Civic Consulting Group, Inc., 2008

6/13/08

BRG CONSULTING INC

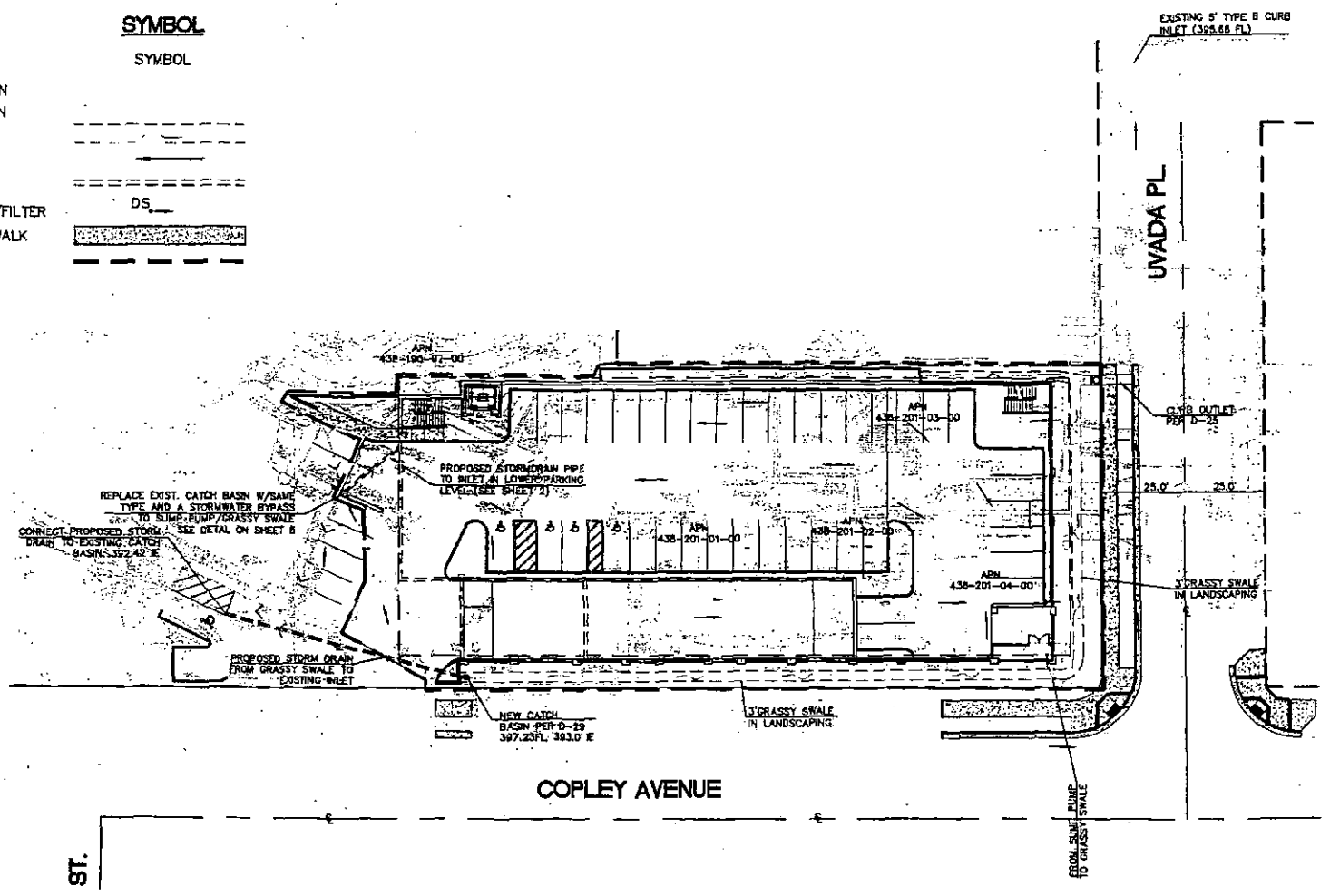
Academy of Our Lady of Peace

Proposed BMP - Classroom Building

FIGURE 5.5-1

CC0519

LEGEND:	SYMBOL
ITEM	SYMBOL
EXISTING STORM DRAIN	
EXISTING CATCH BASIN	
NEW GRASSY SWALE	
NEW DRAINAGE PATH	
NEW STORM DRAIN	
NEW DOWN SPOUT W/FILTER	DS
NEW CONCRETE SIDEWALK	
LIMITS OF GRADING	



SOURCE: Civic Consulting Group, Inc., 2008

6/13/08

BRG CONSULTING, INC

Academy of Our Lady of Peace

Proposed BMP - Parking Structure

FIGURE 5.5-2

Issue 4: What short-term and long-term effects would the project have on local and regional water quality? What types of pre- and post-construction Best Management Practices (BMPs) would be incorporated into the project to preclude impacts to local and regional water quality?

Operation

Implementation of the proposed project would result in an increase of impervious surfaces and pollutant activities onsite and would increase the *potential* for runoff during a storm event to transport pollutants (such as oil and grease) and trash off site.

According to the RWQCB Basin Plan (Basin Plan) for the San Diego region, the project site is located within the San Diego Hydrologic Unit (907.10). The Hydrologic Unit subarea is 907.11. The downstream watershed is identified as Lower San Diego Unit 907.1.

The drainage from the new classroom site would drain into a public storm drain system within Collier Avenue. The drainage from the new parking structure would flow into an existing storm drain system and into a canyon located on the property. All drainage would flow west and ultimately empty into the Pacific Ocean via the City's existing storm drain system.

The Basin Plan identifies beneficial uses of coastal waters. For the Pacific Ocean, the beneficial uses identified include Industrial Service Supply (IND), Navigation (NAV), Contact Water Recreation (REC1), Non-contact Water Recreation (REC2), Commercial and Sport Fishing (COMM), Preservation of Biological Habitats of Special Significance (BIOL), Wildlife Habitat (WILD), Rare, Threatened, or Endangered Species (RARE), Marine Habitat (MAR), Aquaculture (AQUA), Migration of Aquatic Organisms (MIGR), Spawning, Reproduction, and/or Early Development (SPWN), and Shellfish Harvesting (SHELL). The only two beneficial uses that are not identified for this water body are: Estuarine Habitat (EST) and Warm Freshwater Habitat (WARM). According to the Clean Water Act Section 303(b) list, the Pacific Ocean is identified as an impaired water body for Bacteria Indicators. Table CWA 2006 303(d) page 6 of 16, receiving waters in the Hydrologic Area Basin Number 907.11 (the Pacific Ocean) are affected by the following:

- Pollutants/stressor – Fecal Coliform/Bacteria Indicators;
- The TMDL Priority is listed as Medium; and,
- The estimated size affected is 0.37 miles.

Pollutants of Concern:

The following constituents, potential pollutants and conditions of concern for the Classroom Building and Parking Structure are depicted in Table 5.5-1.

TABLE 5.5-1
Pollutants Of Concern From Proposed Development

	General Pollutant Categories								
Project Categories	**Sediments**	**Nutrients**	**Heavy Metals**	**Organic Compounds**	**Trash & Debris**	**Oxygen Demanding Substances**	**Oil & Grease**	**Bacteria & Viruses**	**Pesticides**
Classroom Building (Commercial Development >10,000 sq. ft.)	X	P		P	X	P	X	P	P
Parking Lot	P	P	X		X	P	X		P

Note: X = Anticipated, P = Potential
Source: RWQCB Basin Plan, 1994.

The project site receiving waters, the Pacific Ocean, is affected by fecal coliform/bacteria indicators; therefore, fecal coliform/bacteria indicators is the primary pollutant of concern for the project site. As identified in Table 5.5-1, there are no primary pollutants of concern (coliform/bacteria indicators) emanating from the project site. Secondary pollutants of concern during construction and/or operation of the project include sediments, nutrients (e.g., nitrogen and phosphorus in fertilizers), heavy metals trash and debris, oxygen-demanding substances, oil and grease, bacteria and viruses (typically from animal fecal waste), and pesticides. In addition to managing storm water under NPDES requirements, the applicant is also obligated to manage surface water in conformance with requirements of CCR Title 27, also enforced by the RWQCB. Among the key elements of 27 CCR 20365 are the following:

- Surface water management systems must be designed to manage the 100-year return storm event "to limit, to the greatest extent possible, ponding, infiltration, inundation, erosion, slope failure, washout and overtopping." (This also reduces leachate production and prevents groundwater contamination.)
- Diversion and drainage facilities must prevent surface erosion through judicious use of energy dissipators to decrease the velocity of runoff, slope protection and other erosion control measures.
- Systems must manage and control the volume of water released from the site such that the peak flow rate at the point of discharge does not exceed the peak flow that would occur if there were no waste management facility on the site (this also affects the quantity of storm water discharged.)
- Any surface water contacting waste must be collected and managed as leachate.

Post-Construction BMP Summary

The recommended post-construction BMP plan (provided in EIR Appendix F, Water Quality Technical Report) includes site design, source control, and treatment BMPs. The project is designed to minimize the use of impervious areas to the maximum extent possible. Directly connected impervious areas have been

minimized by draining rooftops into adjacent landscaping prior to discharging to the on-site storm drain conveyance system. Existing on-site landscaping, trees and vegetated slopes would be maintained and preserved to the maximum extent possible during and after construction. All existing landscaping of the slope areas and any new landscaping would be incorporated into the project landscaping plans.

The landscaping would consist of ornamental plantings and ground covers including turfed areas to provide bio-filtration of storm and non-storm runoff. The goal is to achieve plant establishment expeditiously to reduce erosion. A water efficient irrigation system for these landscaped areas would be installed and monitored to reduce over-irrigation and minimize erosion and over watering.

With respect to the proposed classroom building and parking structure, the following are the primary site design control methods of controlling potential pollutants from stormwater runoff:

- Sidewalks are sloped towards landscaping where possible;
- The fire access driveway for the proposed classroom building would be constructed using a plantable "grasscrete" which would allow drainage in this area to pass through grassy vegetation before it is directed to the drainage outlet point;
- Grassy swales are used to direct drainage into landscaping around the planned building; and,
- Roof drainage is directed into downspouts which would discharge directly into adjacent landscaping areas. The grassy swale would be used to treat the drainage collected from the roof areas.

Source Control BMPs are directed at the source of pollutants. With respect to the proposed project, no outside material storage is planned for the project.

Other site design and source control BMP options include inlet stenciling and signage, protected material and trash storage areas, efficient irrigation, storm water education, integrated post management principles, and brow ditches to protect the top of slopes. Implementation of these BMPs would reduce potential water quality impacts to below a level of significance. It is anticipated that the quality of water runoff from the project site would improve as there are currently no operational BMPs being implemented at the sites proposed for development.

B. Ground Water

As discussed in the Geotechnical Report prepared by Petra Geotechnical (EIR Appendix C), the site is located more than 250 feet above the floor of Mission Valley, less than a mile to the north. Considering the coarse-grained nature of the conglomerate beds underlying the site, it is not likely that substantial groundwater is present within the upper 50 feet below the site. Because, the project would not penetrate a depth of greater than 50 feet below the surface and the project would not utilize groundwater, no impact to existing groundwater is anticipated.

5.5.4 Significance of Impacts

A. Hydrology and Water Quality

Implementation of the proposed project would result in a significant Hydrology/Water Quality impact associated with the discharge of runoff into an existing impaired waterbody. However, with the compliance with the SWRCB's requirements and NPDES permit process as applicable, and implementation of BMPS, this impact would be reduced to a level less than significant.

B. Ground Water

Implementation of the proposed project would not result in a significant ground water impact.

5.5.5 Mitigation Measures

No significant impact has been identified as the project would implement specific drainage control improvements and BMPs; therefore, no mitigation measure is required.

5.5.6 Conclusions

With compliance with the SWRCB requirements and NPDES Permit process as applicable, and implementation of BMPs, the proposed project's impact to hydrology/water quality would be reduced to a level less than significant.

5.6 Land Use

This section evaluates the potential for land use impacts based on existing land uses and a review of project consistency with applicable plans, policies and ordinances, as they relate to the proposed project.

5.6.1 Existing Conditions

5.6.1.1 City of San Diego Progress Guide and General Plan

As required by State Planning and Zoning Law, the City has developed "a comprehensive, long-term plan for the physical development of the City, and of any land outside its boundaries which bears relation to its planning" (§ 653000 of the Government Code of the State of California). For the City of San Diego, this plan is known as the Progress Guide and General Plan (adopted March 2008 and Program EIR certified on March 10, 2008). The Progress Guide and General Plan consists of development policies, in the form of Findings, Goals, Guidelines, Standards, and Recommendations for a variety of land use elements. The General Plan also references a series of community plans, which are intended to provide more area-specific guidance on development in San Diego.

5.6.1.2 Greater North Park Community Plan

The proposed project is located within the Greater North Park Community Plan area of the City of San Diego (City of San Diego, 1990). The Plan establishes recommendations and objectives for each of the following elements: Housing, Commercial, Transportation, Community Facilities, Open Space, Conservation, Cultural and Heritage Resources, and Urban Design. The Implementation Program of the Plan provides the methodology necessary to implement the goals and objectives of each plan element. The Community Plan designates land use categories over the project parcels as "School" (in the existing campus core area) with "Single-family" and "Open Space" land use categories on the remainder of the parcel areas (see Figure 2.1-2 in Section 2.0). Because the Community Plan designates the site as a school, the proposed project is consistent with the Community Plan.

The following goals and objectives apply to the proposed project.

A. Transportation

Goal: "Provide a safe and efficient transportation system that maximizes access for residents and visitors to the community, links the community to major activity centers, and minimizes adverse environmental effects."

Objective: "Provide adequate off-street parking in residential and commercial areas."

B. Community Facilities

Goal: "Establish and maintain a high level of public facilities and services to meet the needs of the community."

Objective: "Provide educational facilities, law enforcement, fire protection, libraries and public utilities in accordance with City standards."

C. Open Space Element

Goal: "Provide an open space system which preserves existing canyons and hillsides throughout the community and reintroduces open space areas throughout the community as redevelopment occurs."

Objective: "Preserve remaining undeveloped canyons and hillsides as important features of visual open space and community definition."

D. Conservation Element

Objective: "Encourage water conservation through development and landscape guidelines."

Objective: "Conserve energy by utilizing alternative energy sources and energy efficient building and site design principles."

E. Cultural and Heritage Resources Element

Goal: *"Preserve the cultural and heritage resources of Greater North Park."*

F. Urban Design Element

Goal: *"Enhance the unique character and community image of Greater North Park."*

Objective: *"Preserve the architectural variety and residential character of Greater North Park."*

Objective: *"Ensure that new buildings are in character and scale with their neighborhoods."*

Objective: *"Preserve and restore unique or historic structures within the community."*

5.6.1.3 *San Diego Municipal Code Chapter 13 (Zones)*

Chapter 13, Article 1, Division 4, Residential Base Zones of the San Diego Municipal Code contains the zoning regulations for the project site. The proposed site is zoned RS-1-1 and RS-1-7 (see Figure 2.1-5 in Section 2.0). Figure 2.1-4 shows the actual proposed development areas within the overall project parcels. A private school is an allowable use within these zones, subject to approval of a Conditional Use Permit (the Academy's existing CUP is provided in EIR and Technical Appendices as Appendix J).

5.6.1.4 *City of San Diego Historical Resources Regulations*

The City of San Diego Historical Resources Regulations are provided in Chapter 14, Article 3, Division 2 of the City of San Diego Land Development Code (§143.0201 - §143.0280). The purpose of these regulations is to protect, preserve and where damaged, restore the historical resources of San Diego, which include historical buildings, historical structures or historical objects, important archaeological sites, historical districts, historical landscapes, and traditional cultural properties. These regulations are intended to assure that development occurs in a manner that protects the overall quality of historical resources. It is further the intent of these regulations to protect the educational, cultural, economic, and general welfare of the public, while employing regulations that are consistent with sound historical preservation principles and the rights of private property owners. The Historical Resources Regulations apply to proposed development when the following resources are present on site: designated historical resources, historical buildings,

historical districts, historical landscapes, historical objects, historical structures, important archaeological sites, and traditional cultural properties. With respect to the proposed project, the residences located at 2544 Collier Avenue and 2746 Copley Avenue are considered locally significant historical buildings and therefore the project would be subject to these regulations (U.S. Department of Interior, 1986 and pg.40 of the City of San Diego's CEQA Significance Determination Thresholds, 2007).

The regulations require that projects provide full mitigation for the impact to the resource, in accordance with the Historic Resources Guidelines of the Land Development Manual, as a condition of project approval. Under §143.0260, deviations from the Historic Resources Regulations may be granted (the minimum deviation to afford relief from the regulations of Division 2 and accommodate development) only if the decision maker makes the applicable findings in §126.0504.

5.6.1.5 *City of San Diego Environmentally Sensitive Lands Regulations*

The Environmentally Sensitive Lands (ESL) Regulations are provided in Chapter 14, Article 3, Division 1 of the City of San Diego Land Development Code (§143.0101 – §143.0160). The purpose of these regulations is to protect, preserve and, where damaged, restore, the environmentally sensitive lands of San Diego and the viability of the species supported by those lands. The ESL regulations apply to all proposed development where any portion of the premises contains any of the following: sensitive biological resources; steep hillsides; coastal beaches; sensitive coastal bluffs; and, Special Flood Hazard Areas (100-year floodplains).

The project site contains steep hillsides (as defined by the Land Development Code) and potentially sensitive biological resources as portions of the steep hillsides contain native habitats (coastal sage scrub and southern maritime chaparral); therefore, the proposed project is subject to the ESL regulations related to these two areas. The project site does not contain jurisdictional wetlands, coastal beaches or sensitive coastal bluffs, and is not located in the 100-year floodplain; therefore, the ESL regulations related to these issues do not apply to the proposed project.

The ESL identifies Development Regulations for Sensitive Biological Resources in §143.0141 of the City's Land Development Manual. The applicable regulations and their relationship to the proposed project are discussed below.

A. Sensitive Biological Resources:

- Outside the MHPA, encroachment into sensitive biological resources is not limited, except as set forth in §143.0141(b) and (g).
- All development occurring in sensitive biological resources both inside and outside the MHPA is subject to a site-specific impact analysis conducted by the Assistant Deputy Director of Land Development Review (ADD of the Entitlement Division), in accordance with the Biology Guidelines in the Land Development Manual. The impact analysis shall evaluate impacts to sensitive biological resources and CEQA sensitive species. The analysis shall determine the corresponding mitigation, where appropriate, and the requirements for protection and management. Mitigation may include any of the following as appropriate to the nature and extent of the impact.

a) Acquisition or dedication of another site that can serve to mitigate the project impacts, with limited right of entry for habitat management, as necessary, if the site is not dedicated. This site must have long-term viability and the biological values must be equal to or greater than the impacted site.

b) Preservation or dedication of on-site sensitive biological resources, creation of new habitat, or enhancement of existing degraded habitat, with limited right of entry for habitat management, as necessary, if the site is not dedicated. The site must have long-term viability and the biological values must be equal to or greater than the impacted site.

c) In circumstances where the area of impact is small, monetary payment of compensation into a fund in lieu of other forms of mitigation. The City shall use the fund to acquire, maintain and administer habitat areas pursuant to the City Council Resolution No. R-275129, adopted February 12, 1990. Where appropriate, the City Manager is authorized to enter into agreements with public agencies or private non-profit conservancies or foundations to administer the funds and acquire or maintain habitat preservation areas.

- Grading during wildlife breeding seasons shall be consistent with the requirements of the City of San Diego MSCP Subarea Plan, CEQA, and other state and federal wildlife regulations.

B. Steep Hillsides:

The City's Land Development Manual defines steep hillsides as, "lands that have a slope with a natural gradient of 25 percent (4 feet of horizontal distance for every 1 foot of vertical distance) or greater and a minimum elevation difference of 50 feet, or a natural gradient of 200 percent (1 foot of horizontal distance for every 2 feet of vertical distance) or greater and a minimum elevation differential of 10 feet." Encroachment into steep slopes is only allowed when it is necessary to allow 25% of the site to be developed. If 25% of the site is developed or can be developed without encroaching into the steep slopes, then no encroachment into the steep slopes can be allowed.

5.6.1.6 City of San Diego Multiple Species Conservation Program

The Multiple Species Conservation Program (MSCP) is a comprehensive habitat conservation planning program for southwestern San Diego County. The City's Multiple Habitat Planning Area (MHPA) is the target preserve area under the City's Multiple Species Conservation Program (MSCP).

The project site is not located within the boundaries of a MHPA; however, it is within the MSCP Planning Area and is subject to implementing conditions for habitat, and covered species. In addition, the site abuts sensitive open space/steep slopes that eventually connect to MHPA areas within Mission Valley below the site to the north; and applicable MSCP Subarea Plan Land Use Adjacency Guidelines have been applied to this project as outlined in the Mitigation Section BR10 – A through I for this issue (see Section 5.2 Biological Resources of this EIR).

5.6.1.7 FAA Height and Noticing Requirements

The project site is located within the FAA Part 77 Notification Area Overlay. The FAA has been contacted regarding the proposed project, and the FAA has issued a determination that the project would not

conflict with height requirements and would not be a hazard to air navigation. Determination letters are provided in Appendix K of this EIR and Technical Appendices.

5.6.2 Impact Thresholds

According to the City of San Diego's Significance Determination Thresholds, impacts to land use would be considered significant if the project is:

1. *Inconsistent/conflicts with the environmental goals, objectives, or guidelines of a community or general plan.*
2. *Inconsistent/conflicts with an adopted land use designation or intensity and indirect or secondary environmental impacts occur.*
3. *Substantially incompatible with any other adopted land use plan (i.e., MSCP Subarea Plan).*

5.6.3 Impacts

The proposed project has been designed in consideration of the goals and objectives of the Greater North Park Community Plan and applicable zoning regulations. However, deviations would be required with respect to proposed building heights, setbacks, parking requirements, and historical resources. These deviations are described in detail in Section 3.0 Project Description of this EIR.

Issue 1: Would the proposed project implement or result in a conflict with the goals, objectives, and recommendations of the City of San Diego Progress Guide and General Plan, the Greater North Park Community Plan, and the Mid-City Communities Planned District Ordinance?

5.6.3.1 City of San Diego Progress Guide and General Plan

As stated previously, the General Plan references a series of community plans, which are intended to provide more area-specific guidance on development in the City of San Diego. With respect to the proposed project, the Greater North Park Community Plan is the guiding land use document, and is discussed below.

5.6.3.2 Greater North Park Community Plan

The proposed classroom building, parking structure, and landscaping improvements are associated with the existing school that has been located at the project site since 1925. The school is considered the primary use of the site; therefore, the nature of the proposed improvements would be consistent with the community plan land use designations of the site (School, Open Space, and Single-Family Residential). The proposed classroom building, parking structure, and landscaping renovations have been designed in an effort to achieve balance and compatibility with the character of the existing Academy buildings and landscaping, as well as the development of the surrounding areas. This includes the proposal to limit the scale of the parking garage to a two-level structure (one below grade and one at grade) and to focus development in already developed areas (avoiding encroachment into the canyon as much as feasible).

Table 5.6-1 provides an analysis of the proposed project's consistency with the goals and objectives of the Greater North Park Community Plan that are applicable to the proposed project.

TABLE 5.6-1
Greater North Park Community Plan Goals and Objectives Consistency Analysis

A. Transportation	
Goal: "Provide a safe and efficient transportation system that maximizes access for residents and visitors to the community, links the community to major activity centers, and minimizes adverse environmental effects."	A primary goal of the Academy is to ensure a safe, secure campus for the student population. This goal can be achieved by providing additional parking on-site. Providing remote, off-site parking would conflict with this goal. Measures to allow safe, efficient access in the neighborhood have been implemented in the Fall of 2007 and would continue to be implemented as required by proposed mitigation, and CUP conditions of approval. Please see Section 5.10 Transportation/ Circulation/Parking. Based on this analysis, the goal to provide safe and efficient transportation would be achieved.
Objective: "Provide adequate off-street parking in residential and commercial areas."	The project proposes to provide 94parking spaces on-site. However, the proposed parking would result in a deficit of 10spaces less than the 104 on-site spaces that are required by the City's Municipal Code. Therefore, the project directly conflicts with this objective. The physical impact is considered significant, and unmitigable as the project would not comply with City parking requirements.
B. Community Facilities	
Goal: "Establish and maintain a high level of public facilities and services to meet the needs of the community."	The proposed project would not create a significant demand on public services and facilities in the community. Police and fire services are adequate to serve the proposed project (see EIR Section 2.0). Because no additional population is proposed, the project would not impact schools, parks, or libraries. The proposed project is consistent with this goal. Also, the proposed project does provide an alternative to public schools, and alleviates the demand placed on such facilities.
Objective: "Provide educational facilities, law enforcement, fire protection, libraries and public utilities in accordance with City standards."	The proposed project is consistent with this objective for reasons as stated above.

C. Open Space Element	
Goal: "Provide an open space system which preserves existing canyons and hillsides throughout the community and reintroduces open space areas throughout the community as redevelopment occurs."	The project proposes development in areas already containing development (single-family homes). This would avoid impacts to the adjacent canyons, although minor encroachment would be required. The project does not exceed the ESL regulation's allowable percentage of encroachment into steep slopes. The project is consistent with this goal.
Objective: "Preserve remaining undeveloped canyons and hillsides as important features of visual open space and community definition."	The proposed project is consistent with this objective for reasons as stated above.
D. Conservation Element	
Objective: "Encourage water conservation through development and landscape guidelines."	The project would be consistent with the City's landscape guidelines and would not utilize water in an excessive manner. The proposed project is consistent with this objective.
Objective: "Conserve energy by utilizing alternative energy sources and energy efficient building and site design principles."	The proposed classroom building would be constructed utilizing modern, energy efficient techniques. The proposed project is consistent with this objective.
E. Cultural and Heritage Resources Element	
Goal: *"Preserve the cultural and heritage resources of Greater North Park."*	The project involves the demolition of two locally significant historic buildings. However, this allows the Academy to avoid development in the canyon area and minimize encroachment into steep slopes, provide additional classroom space, and avoid having to make renovations or "gutting" of interiors in order to accommodate additional space within the existing Academy buildings; thereby preserving existing classic interiors. Although two historic residence would be demolished, the Academy, which is a historical and cultural resource for the community would be preserved. Also, the proposed CUP amendment would remove the North and South Terraces as areas designated for parking under the existing CUP, and would, in turn, provide parking in a parking structure, thereby avoiding any impact to the North and South Terraces.

F. Urban Design Element	
Goal: *"Enhance the unique character and community image of Greater North Park."*	The proposed buildings would be constructed so as to complement the existing Academy buildings. The exterior of the new classroom building, including walls, roof and architectural treatments, would complement the materials (stucco, clay tile, wrought iron), color palette, and design character of the Academy and neighborhood. Enhanced landscaping and street improvements are proposed to match the historical character of the area. The proposed project would be consistent with this overall goal.
Objective: *"Preserve the architectural variety and residential character of Greater North Park."*	The proposed project would eliminate two locally significant historic buildings located at 2544 Collier Avenue and 2746 Copley Avenue. These buildings have been determined to be historically significant as examples of the Spanish Eclectic style of architecture. As such, the project would conflict with this objective. The project does propose an architectural style and landscaping that would complement the existing campus.
Objective: *"Ensure that new buildings are in character and scale with their neighborhoods."*	The proposed project would require a height deviation and a setback deviation; however, these deviations do not adversely affect the scale and character of these proposed buildings and the project would be in character and scale with the existing Academy and neighborhood. See EIR Section 5.1 Aesthetics/Neighborhood Character. The project would be consistent with this objective.
Objective: *"Preserve and restore unique or historic structures within the community."*	The proposed project would eliminate two locally significant historic building located at 2544 Collier Avenue and 2746 Copley Avenue. These building have been determined to be historically significant as examples of the Spanish Eclectic style of architecture. As such, the project would conflict with this objective.

Source: McArdle Associates Architects, Inc., 2008

As demonstrated above, the proposed project would be consistent with certain relevant goals and objectives of the Community Plan. However, the on-site parking, as proposed, would result in a deficit of 10 spaces less than the 104 on-site spaces that are required by the City's Municipal Code. Therefore, the project directly conflicts with this objective. The physical impact is considered significant, and unmitigable as the project would not comply with City parking requirements. Also, the proposed project would eliminate two historic buildings located at 2544 Collier Avenue and 2746 Copley Avenue. These buildings have been determined to be locally significant historic examples of the Spanish Eclectic style of architecture. As such, the project would conflict with the Community Plan's objectives to *"Preserve the architectural variety and residential character of Greater North Park," and to, "Preserve and restore unique or historic structures within the community."*

5.6.3.3 *Zoning Ordinance*

The existing Academy is located within the RS-1-7 and RS-1-1 zones. These zones are intended to accommodate residential uses; however, schools are allowed subject to a Conditional Use Permit (CUP).

A. Floor Area Ratio

The allowable floor area ratio (FAR) for the entire project site is 0.45. The total proposed FAR for the project site is 0.15; therefore, the project is consistent with the allowable FAR. Table 5.6-2 depicts how the proposed FAR was derived.

TABLE 5.6-2
FAR Calculation

Campus Area	1,014,264
Existing Campus Building Area	86,035
Proposed Classroom Building Area	21,059
Proposed Parking Structure Building Area	49,358
Total Approximate Building Area	156,452
Floor Area Ratio (F.A.R.)	0.15 (building area divided by 23-acre site area)

Source: McArdle Associates Architects, Inc., 2008

B. Setback

According to §131.0443, Table 131-04D, the required street side setback is 10-feet along Copley Avenue. The project is requesting a deviation of this setback requirement from 10-feet to 8-feet on Copley Avenue. A major component of the project is the renovation of the existing street frontage landscaping for the entire campus. With respect to the Copley Avenue street side frontage, the deviation is requested to allow continuity with the existing campus wall. The new decorative screen wall for the parking structure would match the existing, decorative campus walls, and would be a minimum eight feet from the property line or greater.

Implementation of the proposed project would require City approval of a Planned Development Permit for this proposed deviation, provided that Findings in support of the necessary deviation to the zoning setback

requirements are made. The Findings must demonstrate that the proposal, while not technically meeting the development requirement, would still meet the purpose and intent of the regulations.

The proposed Copley Avenue street side setback deviation is generally consistent with the existing street yard areas of the existing Academy campus. The proposed deviation would allow continuity with the existing campus decorative wall along Copley Avenue and would use building materials similar in character to the surrounding community. In addition, the landscape renovations provided would further enhance the streetscape and neighborhood. Also, increased setbacks would be created by the residences to be demolished along Uvada Street. The entire block along Copley Avenue would have the same established uniform character created when the school was first constructed. Therefore, this duration is not considered a significant land use impact.

C. Structure Height

According to Table 131-04D of the San Diego Municipal Code, the allowable height limit is 30 feet.

The proposed height for the classroom building is 37'6" (at the tallest portion), which exceeds the height limitation by 13 feet 6 inches (13'6") and is not in compliance with the 30-foot height limitation set forth by the requirements of the RS-1-1 and RS-1-7 zones. The proposed classroom height deviation occurs at the far northwest corner of the classroom-building site, on the northern slope, below street level, and not visible from any portion on Collier Avenue. All of the 11,123 square foot footprint of the proposed two-story classroom building would sit on the flat portion of this site, except a 470 square foot portion on the far northwest corner where the site extends slightly past the edge of the slope. This portion represents approximately 4.2% of the building footprint. The proposed classroom building complies with the district height restrictions with the exception of the following:

- Approximately 4.2% of the building extends slightly past the edge of slope, resulting in a retaining wall down to grade. This retaining wall, not visible from neighboring properties, follows the existing contours of the site, as a wedge shape extending approximately 13'6" below finish floor at the lowest corner.
- The proposed classroom building's Collier Street frontage, west elevation and east elevation would be consistent with the 30-foot height limit with the exception of the tower element and two decorative chimneys.
  - The classroom building would be 29 feet 6 inches in height (elevation 422.5 feet) adjacent to Collier Street (south elevation). However, the proposed 367 square foot tower architectural feature would be 35 feet 11 inches in height (elevation 429 feet). This element represents approximately 3.3% of the building footprint.

    Along the west elevation, the classroom building would be consistent with the 30-foot height limit with the exception of two decorative chimney elements, each 64 square feet in size. The chimney feature on the southern end of the west elevation exceeds the height limit by approximately 4 feet 7 inches (elevation 429 feet) and represents approximately 0.57% of the building footprint.

- The chimney element on the northern end of the west elevation is also 64 square feet in size. It exceeds the height limit by approximately 9 feet 6 inches (elevation 429 feet) and represents approximately 0.57% of the building footprint.

These three decorative features reflect neighborhood architectural vernacular and are consistent with the campus and the surrounding neighborhood Spanish Eclectic residential aesthetic.

Because the proposed project would exceed the height limitations applicable to the site of the new classroom building, implementation of the project would require City approval of a Planned Development Permit (provided that Findings in support of the necessary zoning deviations are made) and this project element is therefore not considered to constitute a significant land use or aesthetics/neighborhood character impact (see also EIR Section 5.1 Aesthetics/Neighborhood Character).

D. Parking (Transit Overlay Zone)

The on-site parking required for a school use based on an enrollment of 750 students is 122 spaces. However, the project site is located in a Transit Overlay Zone; therefore, the parking requirement is 85% or 104 spaces. The project proposes to provide a total of 94 on-site spaces in a two-level parking structure (one level below grade and one level at grade) and surface parking. Therefore, as proposed, the project would result in a parking deficit of 10 spaces based on code requirements.

As stated in the City's Significance Determination Thresholds (January 2007), "Non-compliance with the City's parking ordinance does not necessarily constitute a significant environmental impact. However, it can lead to a decrease in the availability of existing public parking in the vicinity of the project. Generally, if a project is deficient by more than ten percent of the required amount of parking and at least one of the following criteria applies, then a significant impact may result." The proposed project would have deficiency of less than 10% (i.e., 9.6%). A detailed discussion for parking is provided in Section 5.10.3.4 of this EIR.

Issue 2: How is the proposed project consistent with the land use designation, intensity of development, and environmental goals of these plans?

The proposed project site is designated in the Community Plan as "School," and underlying "Single-Family Residential" and "Open Space" and is located within the RS-1-7 and RS-1-1 zones. The proposed use (school) is an allowable use, subject to approval of a Conditional Use Permit. The existing CUP/RPO No. 92-0769 would be amended to accommodate the proposed project. As such, the project is considered consistent with the land use designations for the site.

Also, as described above, the proposed project is consistent with the intensity of development allowed for the site, with an overall Floor Area Ratio (F.A.R.) of 0.15, where an F.A.R. of 0.45 is allowed.

E. City of San Diego Historical Resources Regulations

Please refer to EIR Section 5.4 - Historical Resources. A significant impact to two historic buildings, the residences at 2544 Collier Avenue and 2746 Copley Avenue has been identified.

Pursuant to City of San Diego Municipal Code §143.0260, if a proposed development cannot to the maximum extent feasible comply with Division 2: Historical Resources Regulations, a deviation may be considered in accordance with decision Process Four, and supplemental findings pursuant to Municipal Code §126.0504 must be made. The project impact to historical resources is considered to be significant and unmitigated and the project is not considered to be in compliance with the City's Historical Resource Regulations. The project would require approval of supplemental findings pursuant to §126.0504.

F. City of San Diego Environmentally Sensitive Lands Regulations

The City of San Diego's Environmentally Sensitive Lands (ESL) regulations would apply to the proposed project because the project site contains steep slopes and sensitive biological resources (native habitat).

Sensitive Biological Resources

According to CEQA and the City's Biology Guidelines, sensitive biological resources include native habitats, flora and fauna and are further defined as those lands included in the MHPA as identified in the MSCP Subarea Plan (City of San Diego, 1997), and other lands outside of the MHPA that contain wetlands; vegetation communities classifiable as Tier I, II, IIIA or IIIB; and habitat for MSCP covered species, rare, endangered or threatened sensitive biological resources; or narrow endemic species. The ESL identifies General Development Regulations for all ESL and Development Regulations for Sensitive Biological Resources. A discussion of these regulations and their relationship to the proposed project is provided below.

- All construction staging areas would be located within pre-existing disturbed areas. These locations would not alter the landform or cause permanent habitat loss.
- According to the biological resources analysis for the proposed project, no narrow endemic plant species were found during surveys of the proposed project (Rocks Biological Consulting, Inc., 2008). Therefore, no significant impact to narrow endemic species would occur.
- The project impact *area* is not located within the MHPA. According to Section 131.0250(b) of the City's Land Development Code, if a premise is located entirely within the *boundary* of the MHPA, a maximum of 25 percent of the site may be developed.
- No portion of the project site contains existing agricultural areas and the proposed project would not result in the conversion of land in agricultural use to a non-agricultural use. Therefore, no significant impact to agricultural land would occur.
- Impacts to sensitive biological resources would be fully mitigated. The project would result in an impact to 0.6 acres of Southern Maritime Chaparral and 0.1 acres of Ornamental vegetation as a result of Zone 1 Brush Management activity. The project site is not located within the City of San Diego MHPA. Project mitigation must occur at a ratio of 1:1 if mitigation land occurs within MHPA boundaries or at a ratio of 2:1 if mitigation land is outside of the MHPA boundary. Thus, the project

proponent could conserve 0.6 acre of Southern Maritime Chaparral (or a higher-tiered habitat such as coastal sage scrub) within MHPA boundaries or conserve 1.2 acres of Southern Maritime Chaparral, or higher tier community, outside of MHPA boundaries, such as by conserving habitat onsite through a conservation easement.

Alternatively, the applicant may contribute monetary payment into the Habitat Acquisition Fund for upland impacts per LDC 143.0141(i)(3). The City currently charges $35,000 per acre purchased plus a 10% administration fee. Thus, the applicant could deposit $22,100 ($21,000 plus $2,100 administration fee) into the Habitat Acquisition Fund to fully mitigate impacts to onsite Southern Maritime Chaparral.

- No sensitive bird species were identified in the project area. Preconstruction surveys would be conducted prior to construction to ensure no nests are directly impacted, and to ensure no indirect noise impacts to nesting birds occur.
- Sensitive biological resources located outside the allowable development area would be left in a natural state. Therefore, no significant impact to sensitive biological resources located outside the allowable development area would occur.

Steep Hillsides

Encroachment into steep slopes and/or sensitive biological resources is only allowed when it is necessary to allow 25% of the site to be developed (San Diego Municipal Code §143.0142(a)(2)). If 25% of the site is developed or can be developed without encroaching into the steep slopes, then no encroachment into the steep slopes can be allowed. A slope analysis has been prepared for the project. The project development would occur primarily in existing developed areas. However, the classroom building and parking structure would include the development on a portion of the steep slopes that are immediately adjacent to the each building site. However, the proposed project would not disturb the steep hillsides in excess of the encroachment allowances of the Environmentally Sensitive Lands regulations (LDC Chapter 14, Article 3, Division 1). Table 5.6-3 and Table 5.6-4 provide a summary of the slopes on-site and proposed encroachment into steep hillsides.

TABLE 5.6-3
Slope Analysis Table

Minimum Slope	Maximum Slope	Area sq. ft.
0.00%	5.00%	184,772
5.00%	10.00%	18,464
10.00%	15.00%	1,822
15.00%	20.00%	733
20.00%	25.00%	318
25.00%	(over)	808,155
Total Site Area		1,014,264
Total Encroachment onto Slope with gradient over 25%		966 sq. ft. (class room 627 sq. ft.) (Parking Structure 339 sq. ft.)

Source: McArdle Associates Architects, Inc., 2008

TABLE 5.6-4
Total % of Site to Be Developed

Description	Area sq ft.
Overall Property Area	1,014,264 (approx. 23 acres)
Existing Developed School Area	167,042
Additional School Area (Site A)	17,124
Additional School Area (Site B)	6,919
Brush Management Zone 1 Area	37,766
Total Development and Zone 1 Area	228,851
Total Site Area	1,014,264
Total Percentage of Proposed Develop Area and Brush Management Zone 1	228,851/1,014,264 = 22.56%

Source: McArdle Associates Architects, Inc., 2008

The community plan Open Space Element states that, "Hillsides which have significant open space value are the highest priority in terms of preservation. They include any slope of 25 percent gradient or greater and the canyon bottoms." The project would be consistent with this aspect of the Open Space Element as development is proposed in the existing developed portions of the project site, and encroachment into steep slopes is minimized.

The community plan also recommends that any graded areas in steep slope areas shall be revegetated with native vegetation to minimize erosion and soil instability and to enhance the undisturbed open space area. However, the use of native fire resistant and non-invasive species should also be encouraged directly adjacent to development. The project would be consistent with this recommendation as disturbed areas would be replanted with the appropriate vegetation, and fuel modification in Zone 2 would be maintained per City Regulations.

5.6.3.4 Urban Design Guidelines

The Urban Design Guidelines of the community plan include a series of recommendations addressing future development in the community. These recommendations and guidelines have been incorporated into the project design to the extent applicable. The Guidelines require that:

"New development should be consistent with the *scale and* character of the existing development of the surrounding areas" and to, "Relate the height of new buildings to the height of existing development." The proposed classroom building and parking structure would match the existing height of the adjacent Academy buildings.

"Extreme contrasts in color, shape and organization of architectural elements would cause new buildings to stand out in excess of their public importance." The classroom building and parking structure would be constructed of materials and color schemes that match the existing Academy buildings and surrounding neighborhood.

"Building bulk should be controlled through the use of vertical and horizontal offsets and other architectural features (balconies, porches, bay windows) which serve to break up building facades." The proposed buildings incorporate these architectural features.

"The automobile or parking facilities should not be a dominant element of the neighborhood character. On-site parking should be screened or located in areas not highly visible from the street." The project proposes a two-level parking structure, with one subterranean level and one at-grade level. The proposed structure would be similar in appearance and scale as the existing surface parking lot with screen wall that exists today.

5.6.3.5 *FAA Height and Noticing Requirements*

As discussed above, the FAA has been contacted regarding the proposed project, and the FAA has issued a determination that the project would not conflict with height requirements and would not be a hazard to air navigation. Determination letters are provided in Appendix K of this EIR and Technical Appendices. Therefore, no impact is identified for this issue area.

5.6.4 Significance of Impacts

The proposed project would result in a significant and unavoidable land use impact associated with a conflict with the transportation element of the community plan related to the provision of off-street (on-site) parking and the urban design element of the community plan related to preservation of architectural variety and residential character of Greater North Park and the goal to preserve and restore unique or historic structures within the community. Also, the project would require approval of supplemental findings as a result of the impact to historical resources.

5.6.5 Mitigation Measures

The proposed project would result in a land use impact, and no mitigation measure has been identified that would reduce the impact to a level less than significant. Alternatives to the proposed project that would reduce or eliminate this impact are analyzed in Section 9.0 Alternatives in this EIR.

5.6.6 Conclusions

The proposed project is consistent with, and implements a majority of the community plan goals and policies relative to the community facilities element, cultural and heritage resources element, and urban design element. However, as proposed, the two-level parking structure and on-site surface parking would provide 94 spaces, which is 10 spaces less than the 104 spaces required by the Municipal Code. This parking deficiency is considered a significant and unmitigable land use impact. Also, the proposed project would eliminate two historic structures located at 2544 Collier Avenue and 2746 Copley Avenue. These structures have been determined to be historically locally significant as examples of the Spanish Eclectic style of architecture. As such, the project would conflict with the Community Plan's objectives *"Preserve the architectural variety and residential character of Greater North Park," and to, "Preserve and restore unique or historic structures within the community."* Finally, other deviations in the height portions of the classroom building proposed to be built (4.2% of the classroom building exceeds the limitation by 13'6"; a decorative chimney element on the southern end of the west elevation of 0.57% classroom building

footprint would exceed the height limitation; and the chimney element on the northern end of the west elevation, which represents 0.57% of the classroom building footprint, would exceed the height limitation) and fence setbacks (2-foot deviation because of reduction from 10-feet to 8-feet on Copley Avenue) are considered deviations requiring a PDP, but would not be considered significant CEQA impacts.

5.7 Noise

Information contained in this section is summarized from the *Acoustical Site Assessment Academy of Our Lady of Peace*, prepared by Investigative Science and Engineering, Inc. (ISE) (May 6, 2008). This document is provided in Appendix H of this EIR.

5.7.1 Existing Conditions

5.7.1.1 Noise Definitions

The standard unit of measurement of noise is the decibel (dB). The decibel measurement is logarithmic; meaning each increase in one decibel is a tenfold increase in the level of noise. A sound level of zero "0" dB is scaled such that it is defined as the threshold of human hearing and would be barely audible to a human of normal hearing under extremely quiet listening conditions. Such conditions can only be generated in anechoic or "dead rooms." Typically, the quietest environmental conditions (extreme rural areas with extensive shielding) yield sound levels of approximately 20 decibels. Normal speech has a sound level of approximately 60 dB. Sound levels above 120 dB roughly correspond to the threshold of pain.

The minimum change in sound level that the human ear can detect is approximately 3.0 dBA[1]. A change in sound level of 10 dB is usually perceived by the average person as a doubling (or halving) of the sounds loudness[2]. A change in sound level of 10 dB actually represents an approximate 90 percent change in the sound intensity, but only about a 50 percent change in the perceived loudness. This is due to the nonlinear response of the human ear to sound.

As mentioned above, most of the sounds we hear in the environment do not consist of a single frequency, but rather a broad band of frequencies differing in sound level. The intensities of each frequency add to generate the sound we hear. The method commonly used to quantify environmental sounds consists of determining all of the frequencies of a sound according to a weighting system that reflects the nonlinear response characteristics of the human ear. This is called "A" weighting, and the decibel level measured is called the A-weighted sound level (or dBA). In practice, the level of a noise source is conveniently measured using a sound level meter that includes a filter corresponding to the dBA curve.

Although the A-weighted sound level may adequately indicate the level of environmental noise at any instant in time, community noise levels vary continuously. Most environmental noise includes a conglomeration of sounds from distant sources that create a relatively steady background noise in which no particular source is identifiable. For this type of noise, a single descriptor called the Leq (or equivalent sound level) is used. Leq is the energy-mean A-weighted sound level during a measured time interval. It is the 'equivalent' constant sound level that would have to be produced by a given source to equal the average of the fluctuating level measured. For most acoustical studies, the monitoring interval is generally taken as one-hour and is abbreviated *Leq-h*.

[1] Every 3 dB equates to a 50% of drop (or increase) in wave strength, therefore a 6 dB drop/increase = a loss/increase of 75% of total signal strength and so on.

[2] This is a subjective reference based upon the nonlinear nature of the human ear.

To describe the time-varying character of environmental noise, the statistical noise descriptors L10, L50, and L90 are commonly used. They are the noise levels equaled or exceeded during 10 percent, 50 percent, and 90 percent of a stated time. Sound levels associated with the L10 typically describe transient or short-term events, while levels associated with the L90 describe the steady state (or most prevalent) noise conditions. In addition, it is often desirable to know the acoustic range of the noise source being measured. This is accomplished through the maximum and minimum measured sound level (Lmax and Lmin) indicators. The Lmin value obtained for a particular monitoring location is often called the *acoustic floor* for that location.

Finally, a sound measure employed by the State of California (and adopted by the City of San Diego) is known as the Community Noise Equivalence Level (or CNEL) is defined as the "A" weighted average sound level for a 24-hour day. It is calculated by adding a 5-decibel penalty to sound levels in the evening (7:00 p.m. to 10:00 p.m.), and a 10-decibel penalty to sound levels in the night (10:00 p.m. to 7:00 a.m.) to compensate for the increased sensitivity to noise during the quieter evening and nighttime hours.

5.7.1.2 Noise Regulations

A. City of San Diego Noise Ordinance

Construction Noise Impact Thresholds

The City of San Diego Noise Ordinance Section 59.5.0404 governs construction noise emissions within the City. The relevant sections are cited below:

a) *It shall be unlawful for any person, between the hours of 7:00 p.m. of any day and 7:00 a.m. of the following day, or on legal holidays as specified in Section 21.04 of the San Diego Municipal Code, with exception of Columbus Day and Washington's Birthday, or on Sundays, to erect, construct, demolish, excavate for, alter or repair any building or structure in such a manner as to create disturbing, excessive or offensive noise unless a permit has been applied for and granted beforehand by the Noise Abatement and Control Administrator. In granting such permit, the Administrator shall consider whether the construction noise in the vicinity of the proposed work site would be less objectionable at night than during the daytime because of different population densities or different neighboring activities; whether obstruction and interference with traffic particularly on streets of major importance, would be less objectionable at night than during the daytime; whether the type of work to be performed emits noises at such a low level as to not cause significant disturbances in the vicinity of the work site; the character and nature of the neighborhood of the proposed work site; whether great economic hardship would occur if the* work were spread over a longer time; whether proposed night work is in the general public interest; *and he shall prescribe such conditions, working times, types of construction equipment to be used, and permissible noise levels as he deems to be required in the public interest.*

(b) *Except as provided in subsection C. hereof, it shall be unlawful for any person, including The City of San Diego, to conduct any construction activity so as to cause, at or beyond the property lines of any property zoned residential, an average sound level greater than 75 decibels during the 12–hour period from 7:00 a.m. to 7:00 p.m.*

B. Operational Noise Impact Thresholds

The applicable property line noise standards for different land use zones are governed under Section 59.5.0401 of the City of San Diego's noise ordinance and are shown in Table 5.7-1.

The project site is zoned RS-1-7/RS-1-1 (residential). Thus, the standard would be 50.0 dBA Leq-h between the hours of 7 a.m. and 7 p.m., 45 dBA between the hours of 7:00 p.m. and 10:00 p.m. and 40 dBA between the hours of 10:00 p.m. and 7:00 a.m. Operations of the school are not expected between the hours of 10:00 p.m. and 7:00 a.m.

TABLE 5.7-1
City of San Diego Sound Level Limits

Land Use Zone	Time of Day	1-Hour Average Sound Level (dBA Leq)
Residential: All R-1* * Includes RS-1-7/RS-1-1	7 a.m. to 7 p.m. 7 p.m. to 10 p.m. 10 p.m. to 7 a.m.	50 45 40
All R-2	7 a.m. to 7 p.m. 7 p.m. to 10 p.m. 10 p.m. to 7 a.m.	55 50 45
R-3, R-4 and all other Residential	7 a.m. to 7 p.m. 7 p.m. to 10 p.m. 10 p.m. to 7 a.m.	60 55 50
All Commercial	7 a.m. to 7 p.m. 7 p.m. to 10 p.m. 10 p.m. to 7 a.m.	65 60 60
Manufacturing all other industrial including Agricultural and Extractive Industry	any time	75

Source: ISE, 2008.

5.7.1.3 Existing Noise Levels

As discussed in the Acoustical Site Assessment (Appendix H of this EIR), in order to measure the existing noise levels at the project site, three short-term sound level measurements were taken on the project site. The first meter (ML 1) location was located in the southeast portion of the site approximately 250-feet north of Collier Avenue while the second meter location (ML 2) was located in the northern portion of the site roughly 1,500-feet south of Interstate 8. Monitoring for these locations was done in this manner in order to obtain an estimate of the worst-case existing onsite noise levels during normal afternoon traffic conditions. The third meter location (ML 3) was located within the onsite parking lot in order to obtain operational noise levels for parking areas. Table 5.7-2 provides the measured ambient sound levels that were obtained from the project site.

TABLE 5.7-2
Measured Ambient Sound Levels – Academy of Our Lady of Peace

		1-Hour Noise Level Descriptors in dBA					
Site	Start Time	Leq	Lmax	Lmin	L10	L50	L90
ML 1	11:30 a.m.	57.6	60.6	53.9	58.8	57.6	56.1
ML 2	12:45 p.m.	66.6	68.9	64.1	67.5	66.6	65.5
ML 3	2:30 p.m.	58.1	68.0	49.6	61.2	58.8	53.4

Monitoring Locations:
ML 1: Southwestern portion of project site facing I-8.
GPS: 32°45.921'N x 117°08.175'W, EPE 13 ft.
ML 2: Northwestern portion of the project site facing I-8.
GPS: 32°45.986'N x 117°08.197'W, EPE 13 ft.
ML 3: Eastern portion of project site facing Copley Avenue.
GPS: 32°45.959'N x 117°08.098'W, EPE 13 ft.
Measurements performed by ISE on January 30, 2008. EPE = Estimated Position Error.

Source: ISE, 2008.

Measurements collected at the monitoring locations ML 1 and ML 2 reflect the typical sound levels associated with the community setting with existing adjacent roadway activities. The hourly average sound levels (or Leq-h) recorded over the monitoring period ranged between 57.6 dBA at ML 1 and 66.6 dBA at ML 2 overlooking to Interstate 8. The dominant noise source was observed to be from traffic from Interstate 8 (I-8). Monitoring location ML 3 was taken within the parking lot, which showed average sound levels of approximately 58 dBA.

5.7.2 Impact Thresholds

The City of San Diego Significance Determination Thresholds outlines the thresholds for determining significance. Impacts to noise may be considered significant if the project could:

Construction Noise Impact Thresholds:

- *Conduct construction activities between the hours of 7:00 p.m. of any day to 7:00 a.m. of the following day, or on legal holidays as specified in Section 21.04 of the San Diego Municipal Code, with the exception of Columbus Day and Washington's Birthday, or on Sundays, unless a permit has been applied for and granted beforehand by the Noise Abatement and Control Administrator; or,*
- *Generate greater than an average sound level of 75 decibels during the 12-hour period from 7:00 a.m. to 7:00 p.m., except for as provided in subsection C of the City of San Diego Noise Ordinance Section 59.5.0404.*

Operational Noise Impact Thresholds:

- *Generate noise levels above the established City of San Diego Noise Ordinance Section 59.5.0401. The pertinent property line standards would be 50 dBA Leq during the hours of 7:00 a.m. to 7:00 p.m., 45 dBA Leq between the hours of 7:00 p.m. and 10:00 p.m., and 40 dBA Leq during the hours of 10:00 p.m. and 7:00 a.m.*

- *Increase noise levels by 3 dBA in areas that already exceed City or State standards;*
- *Produce a substantial permanent, temporary or periodic increase in ambient noise levels in the project vicinity above noise levels existing without the project; or*
- *Expose people residing or working within an airport land use plan or within two miles of a public airport or public use airport to excessive noise levels.*

5.7.3 Impacts

Issue 1: To what extent could temporary construction noise and permanent operation of the Project exceed the City of San Diego Municipal Code Noise and Abatement Control Ordinance §59.5.01?

5.7.3.1 Construction Noise Levels

The estimated construction equipment noise emissions are provided below in Table 5.7-3 for the following typical construction phases:

- Rough Grading (i.e., clearing, grubbing, and general pad and road alignment formation). This typically consists of three distinct phases: mobilization, scraper hauls/finishing, and additional site finishing work.
- Underground Utility Construction (i.e., general trench-work, pipe laying with associated base material and cover, and ancillary earthwork required to facilitate placement of water pipe systems, etc.).

TABLE 5.7-3
Construction Equipment Noise Levels

Equipment Type	Quantity Used	Duty Cycle (Hrs./Day)	Source Level @50 feet (dBA)	Cumulative Effect @ 50 Feet (dBA Leq-12h)
Rough Grading Operations Noise Levels				
Bulldozer	1	3	75	69.0
Loader	1	3	70	64.0
Water Truck	1	3	70	64.0
Scraper	1	2	80	72.2
Worst-Case Aggregate Sum @ 50 Feet				74.7
Sum @ Property Line				74.7
Underground Utility Construction Noise Levels				
Backhoe	1	3	75	69.0
Loader	2	3	70	67.0
Concrete Truck	8	0.5	75	70.2
Dump Trucks	5	0.5	75	68.2
Worst-Case Aggregate Sum @ 50 Feet				74.8
Sum @ Property Line				74.8

Source: ISE, 2008.

Construction within the proposed project area would typically occur between the hours of 7 a.m. and 7 p.m. Monday through Friday in accordance with City operational requirements and would be primarily utilized in an incremental fashion over the course of construction in accordance with building needs. The nearest property line interface with the respect to the closest construction activities would be approximately 50-feet distant. Noise levels predicted could be as high as 74.7 dBA averaged over the construction period. Based upon these predictions construction noise impacts are not expected to exceed the City of San Diego Noise Ordinance thresholds discussed above in Sections 5.7.1 and 5.7.2. No impact is identified for this issue area.

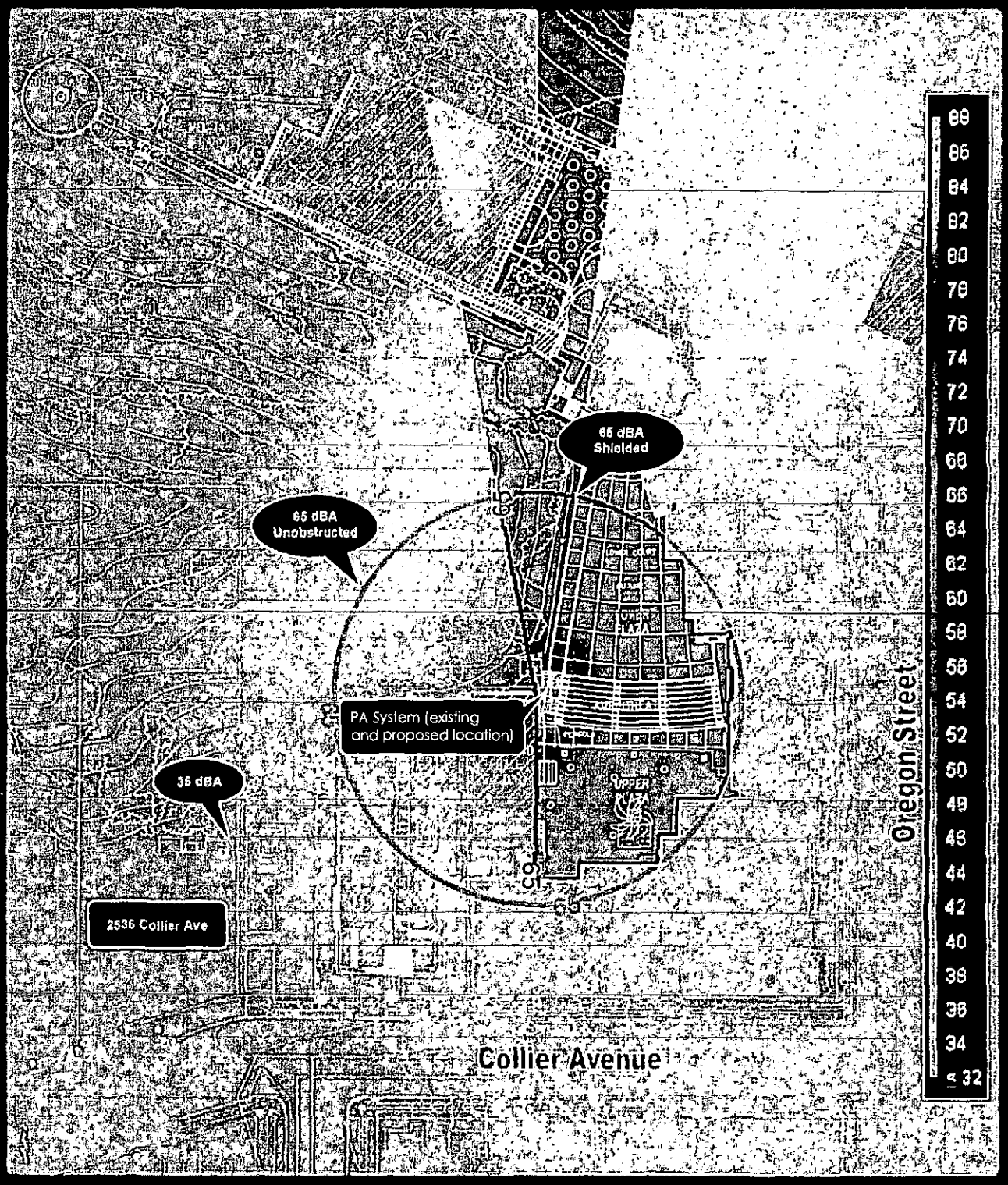
5.7.3.2 *Operational Noise Levels*

A. Expected Operational Noise Levels

Onsite noise generation associated with the proposed project would mainly consist of traffic operations during drop-off and pickup, parking within the proposed parking structure, and from continued use of the onsite public announcement (PA) system. The parking structure on-site can be considered a fixed source noise generator, which is governed under section 59.5.4041 of the City of San Diego's noise ordinance. The Acoustical Site Assessment (Appendix H of this EIR) examined these possible noise events for consistency with the applicable property line standards identified in Table 5.7-1.

It is expected that operations of the public address system would be utilized at any given time within the school day. Utilizing the assumed worst-case 100 percent duty cycle of 98 dBA at five feet (i.e., the PA would emit 98 dBA for an entire hour without intervals or interruption) would yield a 90 dBA hourly equivalent at five feet. This scenario would constitute a worst-case assumption. Figure 5.7-1 provides a 50 dBA Leq-h noise contour plot of the sound levels generated by the PA system based on its current and proposed future location, superimposed atop the proposed site plan for the project. It should be noted that the current location of the PA system is depicted on Figure 5.7-1. The PA is currently utilized by the Academy, and the Academy has moved the location of the PA on several occasions in response to complaints received from adjoining neighbors. However, as indicated on 5.7-1, the existing PA system sound levels do not exceed the City's operational noise impact thresholds. The location of the PA system is not proposed to be moved as part of the project. The construction of the classroom building would provide additional shielding/an intervening barrier between the proposed PA system location and existing residences. In either case (with or without the proposed classroom building) the City's operational noise impact thresholds are/would not be exceeded.

Source data for the proposed parking structure area was taken onsite at the existing eastern parking lot. Sound level measurement distances ranged from vehicular sources within the parking lot to the meter, so it was assumed that the average sound level measured was approximately 20-feet from the meter. As discussed in the Acoustical Site Assessment (Appendix H of this EIR) a sound level of 58 dBA was recorded during the measurement period. Additionally, parking operations within the onsite parking structure would typically occur between the hours of 7:00 a.m. and 4:00 p.m. on a typical weekday although the structure would also be used for other events that would occur at the school.



SOURCE: Investigative Science and Engineering, Inc., 2008

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Academy of Our Lady of Peace

Public Address System Noise Generation

FIGURE 5.7-1

F:\projects\[illegible]\3rd Screencheck EIR\Chapter 5\Figure 5.7-1 Public Address System Noise Generation.ai

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Figure 5.7-2 provides a 50 dBA Leq-h contour plot of the proposed parking structure superimposed atop the proposed site plan for the project [see the Acoustical Site Assessment (Appendix H of this EIR)]. As shown in Figure 5.7-2, noise levels would be at 50 dBA Leq-h at the project site property line, and less than 45 dBA Leq-h at the residential structures closest to the parking structure. Based upon these findings, the noise levels at the property line impacts due to the normal operations of the public address systems or parking structure are below the applicable thresholds of the City of San Diego Noise Ordinance, discussed above in Sections 5.7.1 and 5.7.2. No impact is identified for this issue area.

School activities would primarily occur between 7:00 a.m. and 4:00 p.m.; however, there are activities that will occur in the early evenings, including between the hours of 7:00 p.m. and 10:00 p.m. No activities are proposed after 10:00 p.m. As shown in Figure 5.7-2, use of the parking structure during the 7:00 p.m. to 10:00 p.m. time period would also not exceed City operational noise impact thresholds.

Issue 2: What if any direct or indirect impacts could result on nearby wildlife, on surrounding residential areas and business districts, and on sensitive receptors if noise thresholds are exceeded?

5.7.3.3 Wildlife Noise Impacts

As discussed in Section 5.2 Biological Resources of this EIR, there is a potential for the proposed project to indirectly impact wildlife species because of temporary noise that could occur during construction of the proposed project. Mitigation Measure BR-6 is proposed (see Section 5.2 – Biological Resources) that addresses this potential indirect noise impact to wildlife. Therefore, the indirect noise impacts to wildlife species would be less than significant.

5.7.4 Significance of Impacts

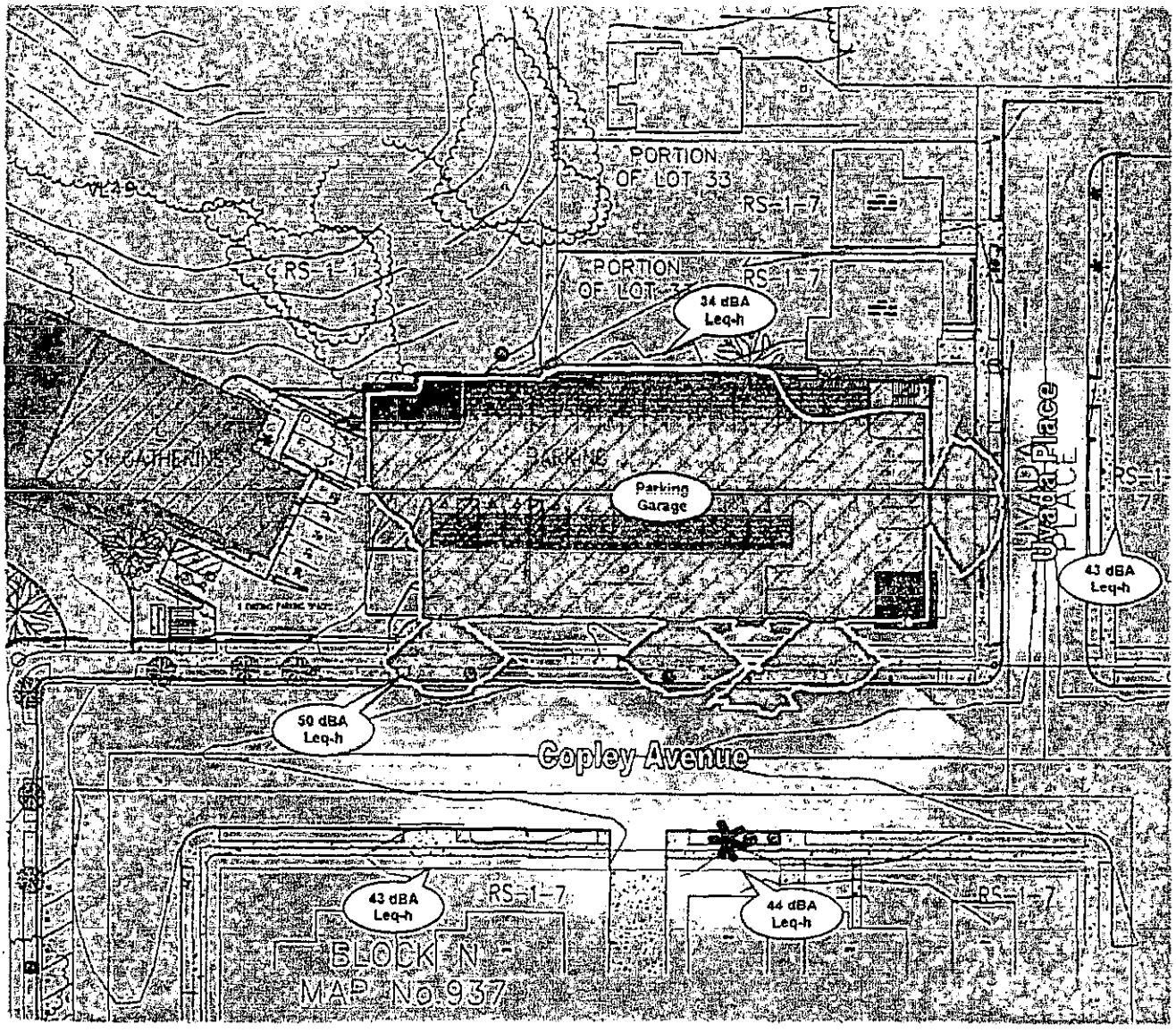
No significant noise impact is identified with the implementation of the proposed project.

5.7.5 Mitigation Measures

No mitigation measures are proposed as no significant noise impact has been identified.

5.7.6 Conclusions

No significant noise impact has been identified with the implementation of the proposed project and no mitigation measures are required.



SOURCE: Investigative Science and Engineering, Inc., 2008 6/17/08

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Academy of Our Lady of Peace

Parking Structure Noise Generation

FIGURE 5.7-2

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5.8 Paleontological Resources

5.8.1 Existing Conditions

As identified in the geotechnical report prepared by Petra Geotechnical, Inc. (Petra) (Petra Geotechnical, Inc., 2008), the site is located on coastal terraces in the western portion of the Peninsular Ranges Physiographic Province of southern California. The project site is underlain by Quaternary Age Lindavista Formation consisting of marine and non-marine sediments (See Section 5.3, Figure 5.3-1).

The Linda Vista Formation is composed of interfingering sandstone and conglomerate. This geologic unit is estimated to be five to 20 feet thick. The formation is composed of nearshore marine and non-marine sediments that were laid down on a wave cut platform ten kilometers wide. This geologic unit is composed of moderate reddish-brown interbedded sandstone and conglomerate. Ferruginous cement, mainly hematite, gives the Linda Vista Formation its characteristic reddish-brown color and resistant nature. The Linda Vista Formation is usually considered to have a moderate paleontological resource sensitivity (Demeré, 1993).

5.8.2 Impact Thresholds

According to the City of San Diego's Significance Determination Guidelines, impacts to paleontological resources would be considered significant if the project would excavate/grade into an underlying geologic formation with sedimentary rocks that usually contain fossils. Additionally, should the project require cuts greater than ten feet, and exceed 2,000 cubic yards, paleontological monitoring would be a required mitigation measure for the proposed project.

5.8.3 Impacts

Issue 1: Would the project impact paleontological resources?

Whenever geologic materials containing fossils are excavated, there is the potential for adverse impacts to the region's paleontological resources. The physical destruction of important fossil remains during construction activities results in the loss of a non-renewable resource, and is considered to be significant. If fossils are discovered onsite during grading the measures described below would mitigate potential adverse impacts to the resources to below a level of significance.

The proposed project includes the construction of underground parking that would require the excavation of approximately 11.5 feet in depth and approximately 7,358 cubic yards (cy). Therefore, the proposed project would require cuts well above the City of San Diego's threshold of ten feet or 2,000 cy for potential paleontological impacts.

The excavation areas associated with the construction activities of the proposed project total approximately 11.5 feet in depth and 7,358 cy, and would disturb fossil-bearing strata in the Linda Vista Formation.

5.8.4 Significance of Impacts

The proposed project would result in the substantial excavation of potential fossil-bearing geologic formations as project grading would exceed 10 feet in depth cuts; and is therefore considered a significant impact.

5.8.5 Mitigation Measures

The following mitigation measures have been developed by the City of San Diego to reduce project-related Paleontological impacts to below a level of significance. These mitigation measures encompass a comprehensive program to protect paleontological resources should they be found at the site. The mitigation program is consistent with standard programs employed at other sites within the City of San Diego. Implementation of these mitigation measures would allow preservation and future scientific study of any important paleontological resources encountered, thereby reducing the potential impact to below a level of significance.

PR-1 Private Project (Dated June 3, 2008)
Paleontological Resources

I. **Prior to Permit Issuance**

A. Entitlements Plan Check

1. Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for Paleontological Monitoring have been noted on the appropriate construction documents.

B. Letters of Qualification have been submitted to ADD

1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the paleontological monitoring program, as defined in the City of San Diego Paleontology Guidelines.
2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the paleontological monitoring of the project.
3. Prior to the start of work, the applicant shall obtain approval from MMC for any personnel changes associated with the monitoring program.

II. **Prior to Start of Construction**

A. Verification of Records Search

1. The PI shall provide verification to MMC that a site specific records search has been completed. Verification includes, but is not limited to a copy of a confirmation letter from San Diego Natural History Museum, other institution or, if the search was in-house, a letter of verification from the PI stating that the search was completed.

2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.

B. PI Shall Attend Precon Meetings

1. Prior to beginning any work that requires monitoring, the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified paleontologist shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Paleontological Monitoring program with the Construction Manager and/or Grading Contractor.
   a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.
2. Identify Areas to be Monitored

   Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits. The PME shall be based on the results of a site specific records search as well as information regarding existing known soil conditions (native or formation).
3. When Monitoring Will Occur
   a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
   b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. Monitor Shall be Present During Grading/Excavation/Trenching

1. The monitor shall be present full-time during grading/excavation/trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. **The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities.**
2. The monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (**Notification of Monitoring**

Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.

3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as trenching activities that do not encounter formational soils as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for resources to be present.

B. Discovery Notification Process

1. In the event of a discovery, the Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.
2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.

C. Determination of Significance

1. The PI shall evaluate the significance of the resource.
   a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. The determination of significance for fossil discoveries shall be at the discretion of the PI.
   b. If the resource is significant, the PI shall submit a Paleontological Recovery Program (PRP) and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.
   c. If resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils) the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been made. The Paleontologist shall continue to monitor the area without notification to MMC unless a significant resource is encountered.
   d. The PI shall submit a letter to MMC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.

IV. Night and/or Weekend Work

A. If night and/or weekend work is included in the contract

1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
2. The following procedures shall be followed.
   a. No Discoveries

      In the event that no discoveries were encountered during night and/or

weekend work, The PI shall record the information on the CSVR and submit to MMC via fax by 8AM on the next business day.

b. Discoveries
All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction.

c. Potentially Significant Discoveries
If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed.

d. The PI shall immediately contact MMC, or by 8AM on the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.

B. If night work becomes necessary during the course of construction
1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
2. The RE, or BI, as appropriate, shall notify MMC immediately.

C. *All other procedures* described above shall apply, as appropriate.

V. Post Construction

A. Preparation and Submittal of Draft Monitoring Report
1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Paleontological Guidelines which describes the results, analysis, and conclusions of all phases of the Paleontological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring,
   a. For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report.
   b. Recording Sites with the San Diego Natural History Museum
   The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the Paleontological Monitoring Program in accordance with the City's Paleontological Guidelines, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report.
2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
4. MMC shall provide written verification to the PI of the approved report.
5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Fossil Remains
   1. The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued.
   2. The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate
C. Curation of fossil remains: Deed of Gift and Acceptance Verification
   1. The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for this project are permanently curated with an appropriate institution.
   2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.
D. Final Monitoring Report(s)
   1. The PI shall submit two copies of the *Final Monitoring Report to MMC* (even if negative), within 90 days after notification from MMC that the draft report has been approved.
   2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

5.8.6 Conclusions

Implementation of Mitigation Measure PR-1 would reduce impacts to Paleontological Resources to below a level of significance.

5.9 Utilities

5.9.1 Existing Conditions

5.9.1.1 Water

San Diego's primary water resources include the Colorado River and the California Aqueduct system. Water supply from these sources is imported by the San Diego County Water Authority (SDCWA). Four major aqueducts channel water from the north into a series of reservoirs and local treatment plants in the San Diego area. Water is distributed locally by various public and private agencies.

An existing six-inch water main line is located within the existing Collier Avenue right-of-way. In addition, an existing water line is located south of the classroom building site from the edge of the Academy's parcel boundary to the existing six-inch water main line.

For the proposed parking structure site, an existing six-inch water line is located within the existing Copley Avenue right-of-way.

5.9.1.2 Sewer

Wastewater generated from the project site is collected by sewer lines owned and operated by the City of San Diego Metropolitan Wastewater Department. Wastewater from the project site is diverted to the Point Loma Wastewater Treatment Plant (PLWTP) via the San Diego Metropolitan Sewer System. The PLWTP provides advanced primary treatment for the City of San Diego and the treated water is discharged into the Pacific Ocean through a 4.5-mile long pipeline outfall. The plant processes an average of 180 million gallons per day (mgpd) of wastewater generated by approximately 2.2 million San Diego residents in a 450 square mile service area. The plant has a treatment capacity of 240 mgpd.

An existing six-inch sewer line is located within the existing Collier Avenue right-of-way, south of the proposed classroom building site. In addition, an existing sewer line is located on the Academy's campus, located west of the proposed parking structure and south of St. Catherine's Hall. This sewer line flows in a southern direction to an existing six-inch sewer line that is located within the Oregon Street and Copley Avenue right-of-ways.

5.9.1.3 Storm Drains

Stormwater drainage from the proposed classroom building site currently flows overland onto a public street gutter and to a D-25 sidewalk underdrain located at Collier Avenue, which eventually discharges into a public storm drain system curb inlet located on the west side of the project site. Approximately 0.08 acres of the proposed classroom building site currently flows overland to the north of the project to a descending slope into Mission Valley.

Stormwater drainage from the proposed parking structure site currently flows overland onto a public street gutter through a D-25 sidewalk underdrain located at Copley Avenue which eventually discharges into a

public storm drain system curb inlet located on the west side of the project site and to an existing onsite stormdrain, which in turn discharges to the canyon located west of the project. Approximately 0.16 acres of the proposed parking structure site currently flows overland to the east public gutter onto a catch basin located on the northwest corner of Uvada Place.

The stormwater collected drainage from both sites would be directed, and passed through a grassy swale on-site, and would eventually discharge into a downstream catch basin which filters the water and then discharges the water into the San Diego River and to the Pacific Ocean, located approximately six miles from the project site.

Under existing conditions, the proposed classroom project site generates approximately 1.93 cubic feet per second (CFS) (a worst-case 100 year 24-hour event scenario) of storm water runoff. The proposed parking garage project site generates approximately 2.23 CFS (worst-case 100 year 24-hour event scenario) of storm water runoff.

Under the proposed conditions, the proposed classroom project site would generate approximately 2.27 CFS (100 year 24-hour event). The proposed parking structure project site would generate 3.40 CFS (a worst-case 100 year 24-hour event scenario) of storm water runoff. Storm water runoff at the proposed classroom and parking structure project sites would increase from 0.34 CFS and 0.54 CFS respectively.

5.9.1.4 *Solid Waste Disposal*

The City of San Diego Environmental Services Department (ESD) provides the following services to the project site: resource management, environmental programs, environmental protection, energy conservation, collection services, and refuse disposal. The ESD pursues waste management strategies that emphasize waste reduction and recycling, composting, and environmentally sound landfill management to meet the City's long-term disposal needs. ESD also ensures that all federal, state, and local mandates relating to waste management are met in an efficient and financially sound manner. Assembly Bill 939 enacted in 1989 required all California cities to divert at least 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting by 2000. By 2004, the City surpassed the required diversion rate (attaining 52 percent), however, because of continually dwindling landfill space, the State legislature plans to increase the amount that must be diverted from local landfills to as much as 75% (see 2008's Senate Bill 1020). As of 2006, the City has achieved 55 percent diversion. About 1.68 million tons of trash is produced annually in San Diego. At this rate of waste disposal, the City's only landfill, the Miramar Landfill, would be filled to capacity by 2012. Based on the City's Significance Determination Thresholds, the project exceeds the threshold for solid waste generation by constructing/ demolition of 50 units or more of single family/multifamily construction or 40,000 square feet or more of commercial construction. Therefore, a Waste Management Plan would be required to be prepared by the applicant and approved by the City of San Diego Environmental Services Department. The plan must be implemented by the applicant and address demolition, construction, and occupancy phases of the project.

The ESD is organized into three divisions: Refuse Collection, Refuse Disposal, and Environmental Programs. Refuse Collection provides weekly service to approximately 305,000 homes and businesses throughout the City; Refuse Disposal ensures the safe and efficient disposal of over 1.4 million tons of waste generated annually in the City; and Environmental Programs implements comprehensive recycling, hazardous materials management, code enforcement and support programs.

There are seven active landfills located within the County of San Diego: West Miramar, Sycamore, Otay Annex, Ramona, Borrego Springs, Las Pulgas, and San Onofre. Only the first five accept municipal solid waste. The latter are military owned and operated and only accept military waste. Thus, solid waste from the proposed project site would be disposed of within the remaining five landfills. The following information is from the Integrated Waste Management Plan, Draft 2004 Countywide Siting Element.

The West Miramar Landfill, located in the City of San Diego, has a remaining capacity of approximately 13.8 million tons with an estimated closure date of 2012 to 2022. The useful life is contingent upon a possible vertical expansion of the landfill. If pursued, the landfill may extend its capacity to accept waste for an additional three to ten years.

Sycamore Landfill, located in the City of San Diego, has a remaining capacity of approximately 17.2 million tons with an estimated closure date of 2017. The landfill operator is currently seeking an expansion of the landfill that would provide additional capacity extending the closure date to approximately 2035.

Otay Annex Landfill, located in the City of Chula Vista, has a remaining capacity of approximately 31.3 million tons with an estimated closure date of 2027.

Ramona Landfill, located in the unincorporated community of Ramona, has a remaining capacity of approximately 294,550 tons with an estimated closure date of 2011.

Borrego Springs Landfill, located in the unincorporated community of Borrego Springs, has a remaining capacity of approximately 117,600 tons with an estimated closure date of 2040.

Estimated remaining capacities are based on design limits specific to each landfill site. Estimated closure dates are determined by site capacity and the maximum daily permitted rate of disposal specific to each site.

5.9.1.5 Electrical Power and Natural Gas (Energy)

The San Diego Gas and Electric Company (SDG&E) provides electrical power and natural gas to the project site. Energy that is provided throughout California, including to the project site is generated by numerous power plants that are located within and outside the State. Electricity and natural gas is supplied via the electric grid and transmission lines. Existing transmission and distribution lines are located on the project site. Electricity is distributed throughout the project site via overhead and underground distribution lines. Natural gas is distributed throughout the project site via underground lines, typically located within the public right-of-way.

5.9.2 Impact Thresholds

The City of San Diego Significance Determination Thresholds outlines the thresholds for determining significance. Impacts to public utilities may be considered significant if the project could:

- *Result in a need for new systems, or require substantial alteration to existing utilities (e.g., natural gas, water, sewer, communication systems, and solid waste disposal), the construction of which would create physical impacts;*
- *Result in the use of excessive amounts of water;*
- *Use landscaping which is predominately non-drought resistant vegetation;*
- *Meet or exceed 50 single family or multi-family units, and/or commercial construction of 40,000 sf;*
- *Result in substantial shading of roofs as to preclude the future installation of solar systems;*
- *Result in the use of excessive amounts of fuel or energy (e.g., natural gas); and,*
- *Result in the use of excessive amounts of power.*

5.9.3 Impacts

Issue 1: Would the proposed project result in the need for new or expanded public facilities including those necessary for water, sewer, storm drains, solid waste disposal, and the provision of energy? If so, what physical impacts would result from the construction of these facilities?

5.9.3.1 Water

Existing domestic water service would be adequate to serve the proposed project. The project would place a relatively small demand for water use, and does not meet the threshold criteria necessitating the preparation of a Water Supply Assessment pursuant to SB 610. Domestic water to the classroom building would be provided through the installation of a one-inch water service lateral pipeline from the classroom building to the existing six-inch water pipeline located within the Collier Avenue right-of-way. The installation of this pipeline would occur within an existing developed area within the Academy's campus and no significant above ground impacts would result from the trenching. Any potential underground impacts to archaeology and/or paleontology would be covered by the required monitoring construction on-site for these issue areas. Therefore, no significant impacts as a result of the trenching and installation of this new pipeline are anticipated.

In order to provide necessary fire flow demands for the ~~proposed project, as part of the project, an upgraded fire hydrant that would connect to the water main in Copley Avenue would be installed near the Copley Avenue and Oregon Street intersection and would remove the existing fire hydrant located on Oregon Street located near the intersection of Oregon Street and Copley Avenue. In addition, to an upgraded fire hydrant, sprinklers would be installed in both the classroom building and parking structure~~ project's proposed improvements, the project will be required to replace the existing six-inch AC

water main in Copley Avenue with a 12-inch diameter water main from Vista Place to Oregon Street and in Oregon Street from Copley Avenue to the existing eight-inch AC water main in Oregon Street.

In addition, the project will be required to connect the newly constructed 12-inch water main in Copley Avenue to the existing 36-inch diameter water main in Copley Avenue located at the intersection of Copley Avenue and Vista Place.

Lastly, the project will be required to install a fire hydrant to the new 12-inch diameter water main in Copley Avenue near the intersection of Copley Avenue and Oregon Street and remove the existing fire hydrant located in Oregon Street located near the intersection of Oregon Street and Copley Avenue. Also, sprinklers would be installed in both the classroom building and parking structure. With the installation of these ~~W~~water infrastructure improvements, ~~or service would be provided as required for the project; and, therefore, this aspect of~~ the proposed project would not result in an impact to water.

5.9.3.2 Sewer

The existing City sewer infrastructure would be adequate to serve the proposed project. The proposed project would include the installation of a four-inch sewer lateral pipeline that would provide connection from the proposed classroom building to the existing six-inch sewer line located within the Collier Avenue right-of-way. The installation of this sewer pipe would occur within an existing developed area within the Academy's campus; therefore, no significant above ground impacts would result from the trenching and any potential underground impacts to archaeology and/or paleontology would be covered by the required monitoring construction on-site for these issue areas. No sewer infrastructure or service would be required for the parking structure; and, therefore, no associated sewer impacts would result from that aspect of the project.

5.9.3.3 Storm Drains

As discussed in Section 5.5 Hydrology/Water Quality of this EIR, a on-site drainage for both the proposed classroom building and parking structure sites would be directed toward the existing stormdrain system. On-site drainage improvements for the project to reduce impacts from increased velocity or water quality contaminants would include a combination of the following:

- Classroom Building Site
  - Sheet flow over vegetated areas,
  - valley gutters,
  - slot drains, and
  - standard sidewalk underdrains.
- Parking Structure Site
  - Sheet flow over vegetated areas,
  - stormdrains,
  - slot drains, and
  - sump pump.

Based on the analysis provided in Section 5.5 Hydrology/Water Quality of this EIR, the proposed project is not adding a significant amount of stormwater drainage to the existing overall storm drain system and the additional drainage would not significantly contribute to downstream reduction of existing pipe capacities. However, the proposed project would continue to discharge runoff from the site into the San Diego River, which is an existing impaired waterbody, which is considered a significant Hydrology/Water Quality impact. With the compliance with the SWRCB's requirements and NPDES permit process and implementation of BMPS, this impact would be reduced to a level less than significant.

5.9.3.4 Solid Waste Disposal

The proposed project is the construction of school facilities, which exceeds the City of San Diego's solid waste threshold for residential and commercial developments. Because the proposed project would require the demolition of three single-family structures and two surface parking lots owned by the Academy, the demolition materials would require disposal at a landfill. Implementation of Mitigation Measures PU-1, which requires the owner/permittee of the proposed project to develop a comprehensive waste management plan, and PU-2, which would verify all the requirements of the Waste Management Plan, are proposed to mitigate this impact to below a level less than significant.

The proposed project would require the demolition of three single-family structures and two surface parking lots owned by the Academy, which may result in a large amount of solid waste to be disposed and therefore, would result in a significant solid waste impact.

5.9.3.5 Communication Systems

Communications systems within the project area are provided by a variety of telecommunications companies. The communication infrastructure associated with the proposed project would connect with existing facilities within the project site. Therefore, the proposed project would not result in an impact to communications systems and no mitigation would be required.

Issue 2: Would the construction and operation of the proposed project result in the use of excessive amounts of electrical power? Would the proposed project result in the use of excessive amounts of fuel or other forms of energy (including natural gas, oil, etc)?

5.9.3.6 Electrical Power and Natural Gas

Forecasting future electrical power and natural gas consumption demand is performed on a continual basis by SDG&E, primarily from installation of transmission and distribution lines. In situations where projects with large power loads are planned, this is considered together with other loads in the project vicinity, and electrical substations are upgraded. Direct impacts to electrical and natural gas facilities are addressed and mitigated by SDG&E at the time incoming development projects occur. Nevertheless, the proposed project would connect to the existing transmission and distribution lines within or otherwise available to the project site. The development of the proposed classroom building would require the relocation of an existing power pole approximately five feet from where it currently exists along Collier Avenue. However,

the relocation of this pole would occur within an existing developed area; therefore, no impacts are anticipated.

The proposed project would not result in a substantial adverse physical impact associated with the provision of new or physically altered electrical power and natural gas facilities.

5.9.3.7 *Solar Energy*

As identified in the City of Diego's Significance Determination Thresholds, a project would result in a significant environmental impact with respect to solar energy if the project does not meet the City's Council Policy 900-14 "Sustainable Building Policy" or the project would result in shading roofs as to preclude future installation of solar systems. The proposed project design would be reviewed for compliance with the Sustainable Building Policy. Feasible measures such as the design and construction of mechanical and electrical systems to achieve the maximum energy efficiency achievable with current technology would be implemented. As such, the project would not result in the use of excessive amounts of solar energy. The proposed parking structure and the portion of the classroom building adjacent to any buildings would be compliant with the zoning and height regulations and would not shade adjacent uses. Furthermore, adjacent buildings do not currently utilize passive solar collection, solar collectors for hot water heating, or photovoltaic collectors; nevertheless, the proposed project would not preclude the future installation of solar systems. The proposed project would not result in an impact to the use of solar energy and no mitigation would be required.

5.9.4 Significance of Impacts

The proposed project would require the demolition of three single-family structures and two surface parking lots owned by the Academy which may result in a large amount of solid waste disposal and therefore, would result in a significant solid waste impact. Besides the impact to solid waste, the proposed project would not result in a significant impact to any other pubic utilities.

5.9.5 Mitigation Measures

The following mitigation measure has been developed by the City of San Diego to reduce project-related Solid Waste impacts to below a level of significance.

PU-1 **Solid Waste** – Prior to the issuance of any building permit, the ADD of LDR shall verify that the Owner/Permittee has developed a comprehensive waste management plan in coordination with the City's Environmental Services Department.

PU-2 **LDR Plan Check –** Prior to the issuance of any permit, including but not limited to, any discretionary action, grading, or any other permits, the Assistant Deputy Director (ADD) shall verify that all the requirements of the Waste Management Plan (as required by Mitigation Measure PU-1) have been shown and/or noted on the Demolition and/or Grading Plans (construction documents).

1. Prior to issuance of a demolition permit, the permittee shall be responsible to arrange a pre-construction meeting. This meeting shall be coordinated with Mitigation Monitoring Coordinator (MMC) to verify that implementation of the waste management plan shall be performed in compliance with the plan approved by Land Development review (LDR) and ESD, to ensure that impacts to solid waste facilities are mitigated to below a level of significance.

2. The plan (construction documents) shall include the following elements for demolition, construction, and occupancy phases of the project as applicable:
   (a) Tons of waste anticipated to be generated,
   (b) Material type of waste to be generated,
   (c) Source separation techniques for waste generated,
   (d) How material would be reused on-site,

   (e) Name and location of recycling, reuse, or landfill facilities where waste would be taken if not reused on-site,
   (f) A "buy recycled" program,
   (g) How the project would aim to reduce the generation of construction/demolition debris,
   (h) A plan of how waste reduction and recycling goals would be communicated to subcontractors, and
   (i) A time line for each of the three main phases of the project as stated above.

3. The plan shall strive for a goal of 50% waste reduction.

4. The plan shall include specific performance measures to be assessed upon the completion of the project to measure success in achieving waste minimization goals. The Permittee shall notify MMC and ESD when:
   (a) A construction permit is issued,
   (b) When construction begins,
   (c) The permittee shall arrange for progress inspections, and a final inspection, as specified in the plan and shall contact both MMC and ESD to perform these periodic site visits during demolition and construction to inspect the progress of the project's waste diversion efforts. Notification shall be sent to:

MMC/Tony Gangitano	Angelee Mullins
Mitigation Monitoring Coordination	Environmental Services Dept.
9601 Ridgehaven Court	9601 Ridgehaven Court
Ste. 320, MS 1102B	Ste. 320, MS 1103B
San Diego, CA 92123-1636	San Diego, CA 92123-1636
(619) 980-7122 or (858) 627-3360	(858) 492-5010
When demolition ends.	

Prior to the issuance of a grading permit, the applicant shall receive approval from the ADD that the Waste Management Plan has been prepared, approved, and implemented. Also, prior to the issuance of the Certificate of Occupancy, the applicant shall submit evidence to the ADD that the final Demolition/Construction report has been approved by MMC and ESD. This report shall summarize the results of implementing the above Waste Management Plan elements, including: the actual waste generated and diverted from the project, the waste reduction percentage achieved, and how that goal was achieved, etc.

Preconstruction Meeting

1. At least thirty days prior to beginning any work on the site, demolition and/or grading, for the implementation of the MMRP, the Permittee is responsible to arrange a Preconstruction Meeting that shall include: the Construction Manager or Grading Contractor, MMC, and ESD and the Resident Engineer (RE), if there is an engineering permit.
2. At the Preconstruction Meeting, the Permittee shall submit Three (3) reduced copies (11" x 17") of the approved Waste Management Plan to MMC (2) copies and to ESD (1) copy.
3. Prior to the start of demolition, the Permittee/Construction Manger shall submit a construction schedule to MMC and ESD.

During Construction

The Permittee/Construction manger shall call for inspection by both MMC and ESD who would periodically visit the construction site to verify implementation of the Waste Management Plan.

Post Construction

1. After completion of the implementation of the MMRP, a final results report shall be submitted to MMC to coordinate the review by the ADD and ESD.
2. Prior to final clearance of any demolition permit, issuance of any grading or building permit, release of the grading bond and/or issuance of a Certification of Occupancy, the applicant shall provide documentation that the ADD or LDR and ESD, that the Waste Management Plan has been effectively implemented.

5.9.6 Conclusions

Implementation of Mitigation Measures PU-1 and PU-2 would reduce the impacts to public utilities (Solid Waste disposal) as a result of the construction of the proposed project to below a level of significance.

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5.10 Transportation/Circulation/Parking

The following analysis summarizes the traffic study prepared by Urban Systems Associates, Inc. (June 18, 2008) evaluating the traffic-related impacts of the proposed project. The traffic study technical report is provided in Appendix I of this EIR.

5.10.1 Existing Conditions

5.10.1.1 Methodology

A description of the methodology used in preparation of the traffic analysis is provided in Section 4.0 of the Traffic Impact Analysis (Urban Systems Associates, Inc. June 18, 2008, see Appendix I of this EIR). The analysis was prepared in accordance with the *City of San Diego Traffic Impact Study (1998)* and the *City of San Diego Significance Determination Thresholds (2007)*.

A typical Traffic Impact Analysis was not prepared for the proposed project. The Academy has already exceeded the enrollment allowed by the existing CUP by 110 students (640 students are currently allowed, and current enrollment is 750 students). Therefore, traffic that would be generated by this project (the CUP enrollment increase) is already on the street and is included in the existing traffic count data. The purpose of the study was to identify measures that can be implemented to improve safety and minimize impacts during the AM and PM school arrival and departure times.

A. Levels of Service

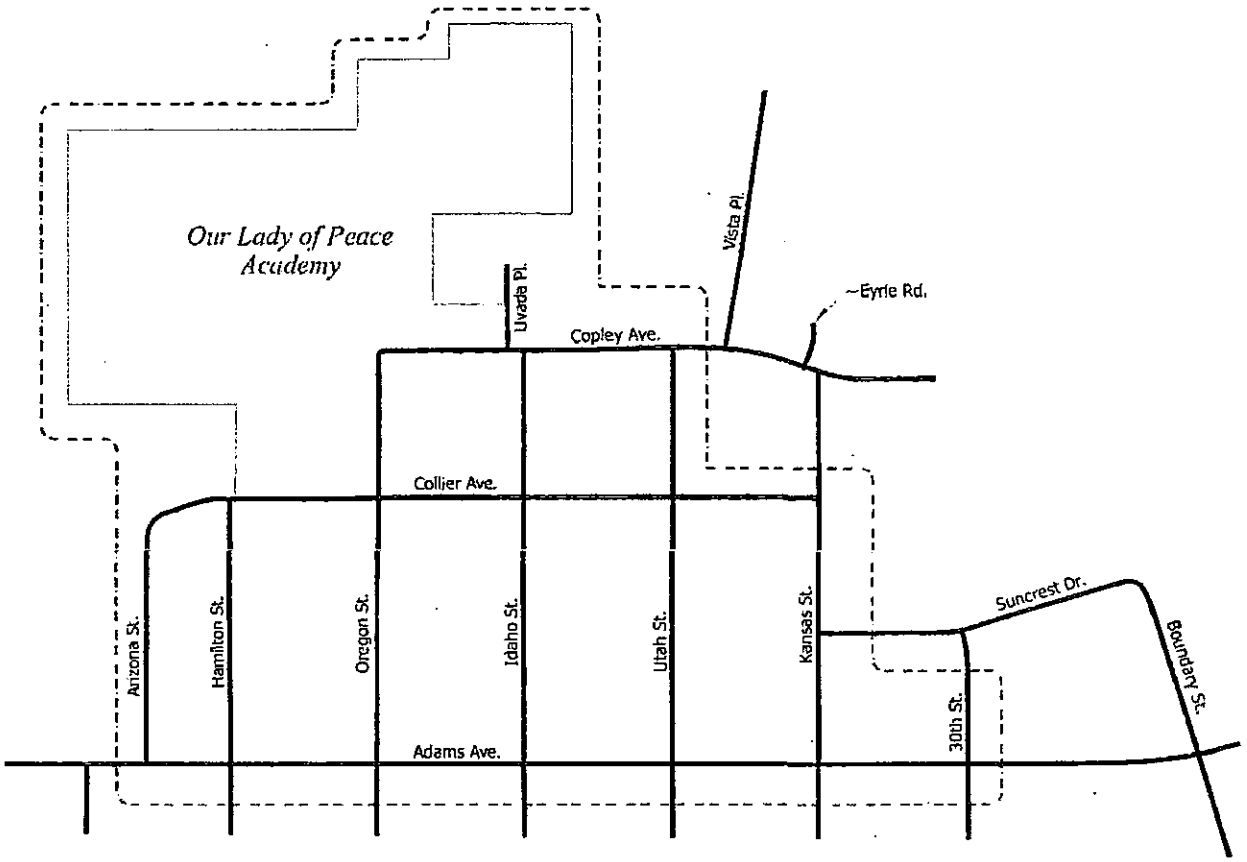
When analyzing street segments, the level of service (LOS) must be determined. LOS is a measure used to describe the conditions of traffic flow. LOS is expressed using letter designations from "A" to "F". LOS "A" represents the best case and LOS "F" represents the worst case. Generally LOS "A" through "C" represents free flowing traffic conditions with little or no delay. LOS "D" represents limited congestion and some delay, however, the duration of periods of delay are acceptable to most people. LOS "E" and "F" represent significant delays on local streets, which are generally not accepted for urban design purposes.

5.10.1.2 Existing Circulation Network

Figure 5.10-1 depicts the study area established for the proposed project in the traffic impact analysis. The project site is located in a residential area at the intersection of Oregon Street and Collier Avenue. The principle roadways in the study area are identified below:

Study Area Streets

- Oregon Street
- Collier Avenue
- Copley Avenue
- Arizona Street
- Hamilton Street
- Kansas Street
- Suncrest Drive
- Adams Avenue
- Idaho Street
- Utah Street



LEGEND

- - - - - - = Project Study Area Boundary

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SOURCE: Urban Systems Associates, 2008

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Project Area Study Boundary

FIGURE 5.10-1

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F:\projects\635 Academy of Our Lady of Peace\Chapter 5\Figure 5.10-1 Project Area Study Boundary.ai

Figure 5.10-2 depicts the existing streets within the study area. As shown, most streets are 50 feet wide curb to curb in a 70 to 80 foot right of way. Hamilton Street and Idaho Street are 40 feet curb in width. Parallel parking exits along most of the streets except along the school frontage on Collier Avenue and Oregon Street where diagonal parking is provided.

Speed limits on all the streets in the project area except for Adams Avenue are 25 miles per hour because they are in a residential zone. The speed limit on Adams Avenue is posted at 30 miles per hour. Adams Avenue also has a continuous two way left turn lane within the study area boundary. Existing average daily traffic volumes are summarized on Figure 5.10-3. Traffic count data was obtained the week of May 14-18, 2008.

A. Street Segments

Figure 5.10-3 provides the Existing Average Daily Traffic Volumes in the study area. Based on average daily traffic volumes, street widths and functional classification and city street standards, existing street segment LOS were determined. Table 5.10-1 summarizes the result of this analysis. As shown in Table 5.10-1, all streets in the study area, except for Adams Avenue, presently operate at an LOS C or better. Adams Avenue operates at an acceptable level of service (i.e. LOS C or D) for all segments except for east of 30th Street, which operates at a LOS E.

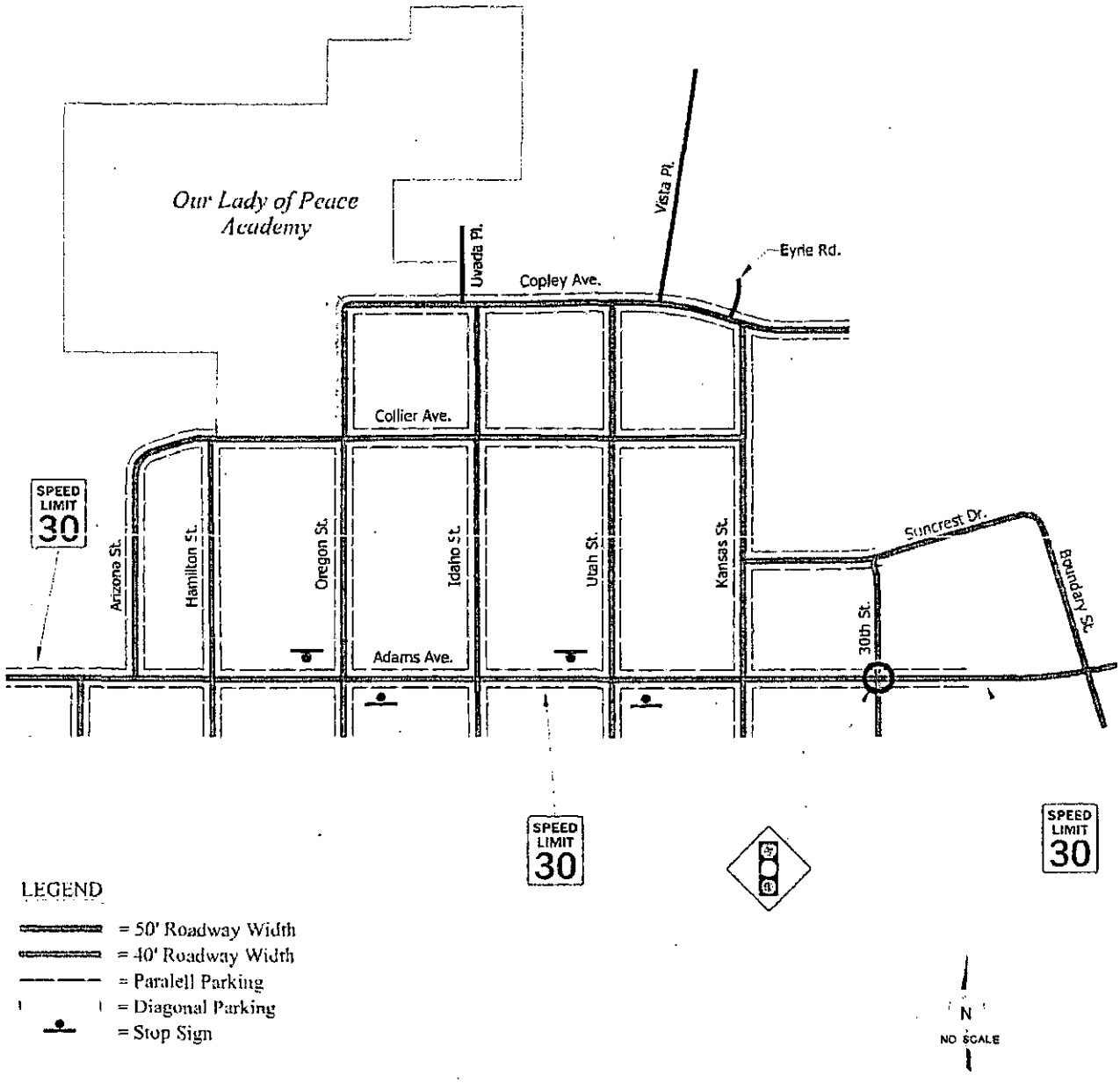
B. Intersections

Four intersections were evaluated. Table 5.10-2 shows the four locations analyzed and the existing LOS. As shown in the table, all intersections operate at an acceptable LOS (i.e. LOS D or better) during both the AM and PM peak hours.

5.10.2 Impact Thresholds

The project site is located in the City of San Diego. According to the City of San Diego's Significance Determination Thresholds, impacts to transportation/traffic circulation/parking would be considered significant if the project would:

- *If any intersection, roadway segment, or freeway segment affected by a project would operate at LOS E or F under either direct or cumulative conditions, the impact would be significant if the project exceeds the thresholds shown in the table below (Table 5.10-3);*
- *At any ramp meter location with delays above 15 minutes, the impact would be significant if the project exceeds the thresholds shown in the table below;*
- *If a project would add a substantial amount of traffic to a congested freeway segment, interchange, or ramp, the impact may be significant;*
- *The project would add a substantial amount of traffic to a congested freeway segment, interchange, or ramp as shown in the table below;*
- *If a project would increase traffic hazards to motor vehicles, bicyclists, or pedestrians due to proposed non-standard design features (e.g. poor sight distance, proposed driveway onto an access-restricted roadway), the impact would be significant;*



SOURCE: Urban Systems Associates, 2008

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Existing Streets Within Study Area

FIGURE 5.10-2

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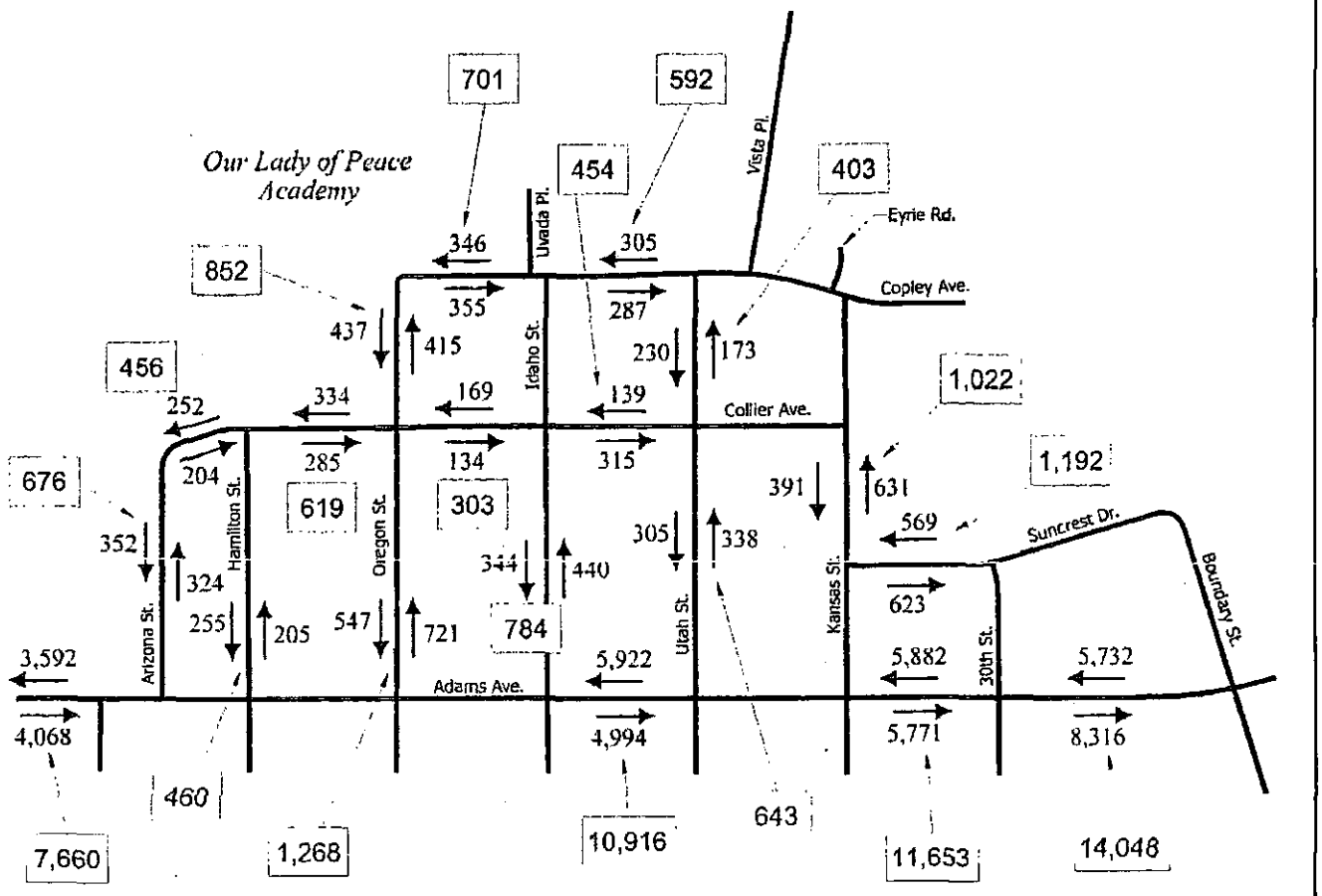

SOURCE: Urban Systems Associates, 2008

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Existing Average Daily Traffic Volumes in the Study Area

FIGURE 5.10-3

F:\projects\635 Academy of Our Lady of Peace\Chapter 5\Figure 5.10-3 Existing Average Daily Traffic Volumes in Study Area.ai

TABLE 5.10-1
Existing Street Segment Levels of Service

Road	Segment	Standard	Class	Cap*	Volume	V/C	LOS
Oregon Street	Copley Ave. to Collier Ave.	SD	2-L	2,200	852	0.39	B
	Collier Ave. to Adams Ave.	SD	2-L	2,200	1,268	0.58	C
Collier Avenue	Arizona St. to Hamilton St.	SD	2-L	2,200	456	0.21	A
	Hamilton St. to Oregon St.	SD	2-L	2,200	620	0.28	A
	Oregon St. to Idaho St.	SD	2-L	2,200	303	0.14	A
	Idaho St. to Utah St.	SD	2-L	2,200	454	0.21	A
Copley Avenue	Oregon St. to Idaho St.	SD	2-L	2,200	701	0.32	B
	Idaho St. to Utah St.	SD	2-L	2,200	592	0.27	A
Arizona Street	Collier Ave. to Adams Ave.	SD	2-L	2,200	676	0.31	A
Hamilton Street	Collier Ave. to Adams Ave.	SD	2-L	2,200	460	0.21	A
Idaho Street	Collier Ave. to Adams Ave.	SD	2-L	2,200	784	0.36	B
Utah Street	Copley Ave. to Collier Ave.	SD	2-L	2,200	403	0.18	A
	Collier Ave. to Adams Ave.	SD	2-L	2,200	643	0.29	A
Kansas Street	Collier Ave. to Suncrest Dr.	SD	2-L	2,200	1,222	0.56	C
	Suncrest Dr. to Adams Ave.	SD	2-L	2,200	885	0.40	B
Suncrest Drive	Kansas St. to 30th St.	SD	2-L	2,200	1,192	0.54	C
Adams Avenue	West of Arizona St.	SD	2-Ca	15,000**	7,660	0.51	C
	Idaho St. to Utah St.	SD	2-Ca	15,000	10,916	0.73	D
	Kansas St. to 30th St.	SD	2-Ca	15,000	11,653	0.78	D
	30th St. to Ohio St.	SD	2-Ca	15,000	14,048	0.94	E

Source: Urban Systems Associates, 2008.
Notes:
Class = Functional Class
2-L = 2 lane Local w/40 or 50 feet curb to curb
2-Ca = 2 lane Collector w/ continuous left turn lane
Cap = Capacity
LOS = Level of Service
* = LOS "C" Capacity
** = LOS "E" Capacity

TABLE 5.10-2
Existing Intersection Level of Service

Number	Intersection	Control	AM Peak Hour		PM Peak Hour	
			Delay	LOS	Delay	LOS
1	Collier Avenue/Oregon Street	Unsignalized	15.1	C	9.0	A
2	Adams Avenue/Oregon Street	Unsignalized	29.1	D	13.7	B
3	Adams Avenue/Utah Street	Unsignalized	22.0	C	15.4	C
4	Adams Avenue/30th Street	Signalized	17.0	B	28.9	C

Source: Urban Systems Associates, Inc., 2008.

Table 5.10-3
Significant Transportation Impact Measure

Level of Service*	Allowable Change Due to Project Impact**					
	Freeways		Road Segments		Intersections	Ramp Metering
	V/C	Speed (mph)	V/C	Speed (mph)	Delay (sec)	Delay (min)[2,3]
E (or ramp meter delays above 15 min.)	0.010	1.0	0.02	1.0	2.0	2.0
F (or ramp meter delays above 15 min.)	0.005	0.5	0.01	0.5	1.0	1.0

Notes 1: V/C = Volume/Capacity Ratio

Note 2: The City of San Diego's allowable increase in delay at a ramp meter with more than 15 minutes delay and freeway LOS E is 2 minutes.

Note 3: The City of San Diego's allowable increase in delay at a ramp meter with more than 15 minutes delay and freeway LOS F is 1 minute.

* = All LOS measurements are based upon Highway Capacity Manual procedures for peak-hour conditions. However, V/C ratios for roadway segments are estimated on an ADT/24-hour traffic volume basis (using Table 2 of the City's Traffic Impact Study Manual). The acceptable LOS for freeways, roadways, and intersections is generally "D" ("C" for undeveloped locations). For metered freeway ramps, LOS does not apply. However, ramp meter delays above 15 minutes are considered excessive.

** = If a proposed project's traffic causes the values shown in the table to be exceeded, the impacts are determined to be significant. The project applicant shall then identify feasible improvements (within the Traffic Impact Study) that would restore/and maintain the traffic facility at an acceptable LOS. If the LOS with the proposed project becomes unacceptable (see above * note), or if the project adds a significant amount of peak-hour trips to cause any traffic queues to exceed on- or off- ramp storage capacities, the project applicant shall be responsible for mitigating the project's direct significant and/or cumulatively considerable traffic impacts.

Source: City of San Diego Traffic Impact Manual, 2007.

- *If a project would result in the construction of a roadway which is inconsistent with the General Plan and/or a community plan, the impact would be significant if the proposed roadway would not properly align with the other existing or planned roadways;*
- *If a project would result in a substantial restriction in access to publicly or privately owned land, the impact would be significant;*

To determine project impacts, the City of San Diego has developed a series of thresholds based on allowable increases in volume-to-capacity ratios, which become more stringent as level of service worsens. Table 5.10-3 summarizes these thresholds. The acceptable level of service for roadway segments and intersections in San Diego is LOS D.

In summary, there are two criteria used to establish if projects have significant impacts:

1) Unacceptable level of service; or,

2) Change in delay of two seconds or two percent for segments.

5.10.3 Impacts

Issue 1: What direct and/or cumulative traffic impacts would the project have on existing and planned community?

5.10.3.1 Project Trip Generation and Distribution

Table 5.10-4 provides the trip generation associated with the 110-student enrollment increase and describes the basis for determining the additional traffic from the existing condition (which is also the proposed condition). Based on this, the proposed project is anticipated to generate a total of 198 daily trips. Figure 5.10-4 depicts project trip distribution percentages for the proposed project. Table 5.10-5 provides the project only daily and peak traffic conditions. Based on Table 5.10-5, the proposed project would result in 198 daily trips, 40 AM peak and 28 PM peak trips are estimated to be generated by the 110 students.

TABLE 5.10-4
Project Trip Generation

Existing Student Enrollment	750 Students
Approved (CUP) Student Enrollment	640 Students
Difference	110 Students (increase in permitted)
Average Daily Traffic (ADT) Generation Calculation	
110 Students x 1.8 trips/student*	**198 daily trips**

Source: Urban Systems Associates, 2008.
* High School trip generation per San Diego Municipal Code, Trip Generation Manual, May 2003.

TABLE 5.10-5
Project Only Daily and Peak Traffic

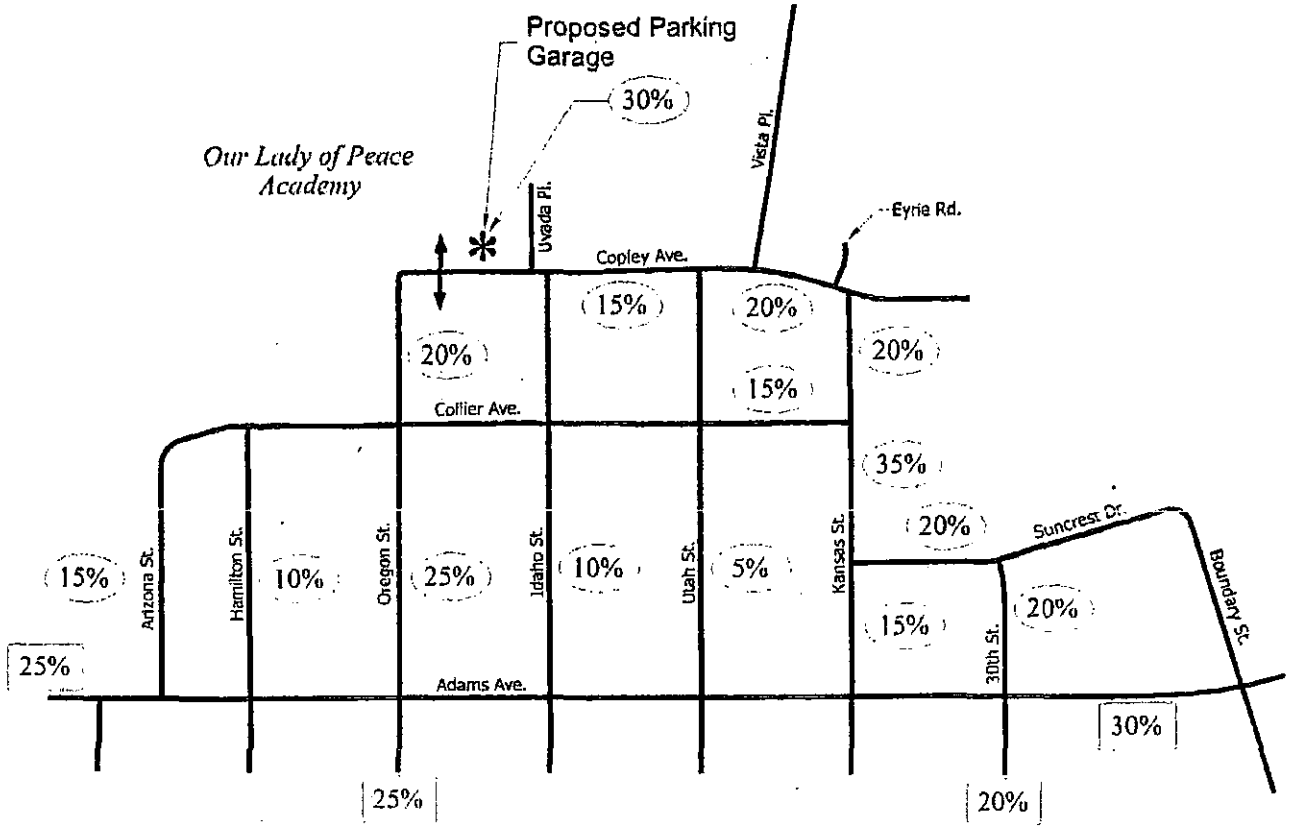
Use	Rate	ADT	AM Peak Hour				PM Peak Hour			
			%	#	In (58)	Out (42)	%	#	In (57)	Out (43)
110 Students	1.8	198	20	40	32	8	14	28	20	8

Source: Urban Systems Associates, 2008.

5.10.3.2 Near-Term Conditions

A. Street Segments

Because all street segments operate at acceptable levels of service (except for Adams Avenue east of 30th Street), the change in permitted enrollment would not result in a significant impact to street segments (Table 5.10-1). On Adams Avenue east of 30th Street, which operates at a level of service "E", the allowable change in segment volume would be 2 percent of 15,000, which is 300 trips. Project traffic on Adams Avenue east of 30th Street is 30 percent of trip generation, or 60 trips, (200 x .30 = 60 trips), which falls far below the 300 trips significance threshold. Therefore, project traffic on Adams Avenue east of 30th Street would not result in a significant impact.



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XX% = Primary Arrival / Departure Route To & From School

(XX%) = Distribution For Parking Garage & On-Street Parking

NOTE

Percentages decrease closer to the campus due to on-street parking.

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NO SCALE

SOURCE: Urban Systems Associates, 2008

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Project Trip Distribution Percentages

FIGURE 5.10-4

F:\projects\635 Academy of Our Lady of Peace\Chapter 5\Figure 5.10-4 Project Trip Distribution Percentages.ai

B. Intersections

Because the intersection of Oregon Street at Adams Avenue currently operates at an acceptable level of service (i.e., with the existing 750-student enrollment level), the intersection does not need to be evaluated (Table 5.10-2). To determine if there would have been a significant change in delay i.e. 2 seconds at level of service "E", a reanalysis was completed.

The reanalysis provided in Appendix C of the Traffic Impact Analysis, shows that the change in delay is only 1.2 seconds. Table 5.10-6 provides a summary of the impact and significance analysis that was conducted. Since this change falls below the 2-second significance criteria, the project does not have a significant impact to intersections. All intersections with the addition of project traffic would operate at an acceptable level of service; therefore, no significant impact to intersections is identified.

TABLE 5.10-6
Impact/Significance Analysis Summary for Intersections

Facility	Volume Without Project	V/C	Project Trips	Volume with Project	V/C	V/C Change	Significance?
Adams East of 30th	13,988	0.953	60	14,048	0.936	0.003	No

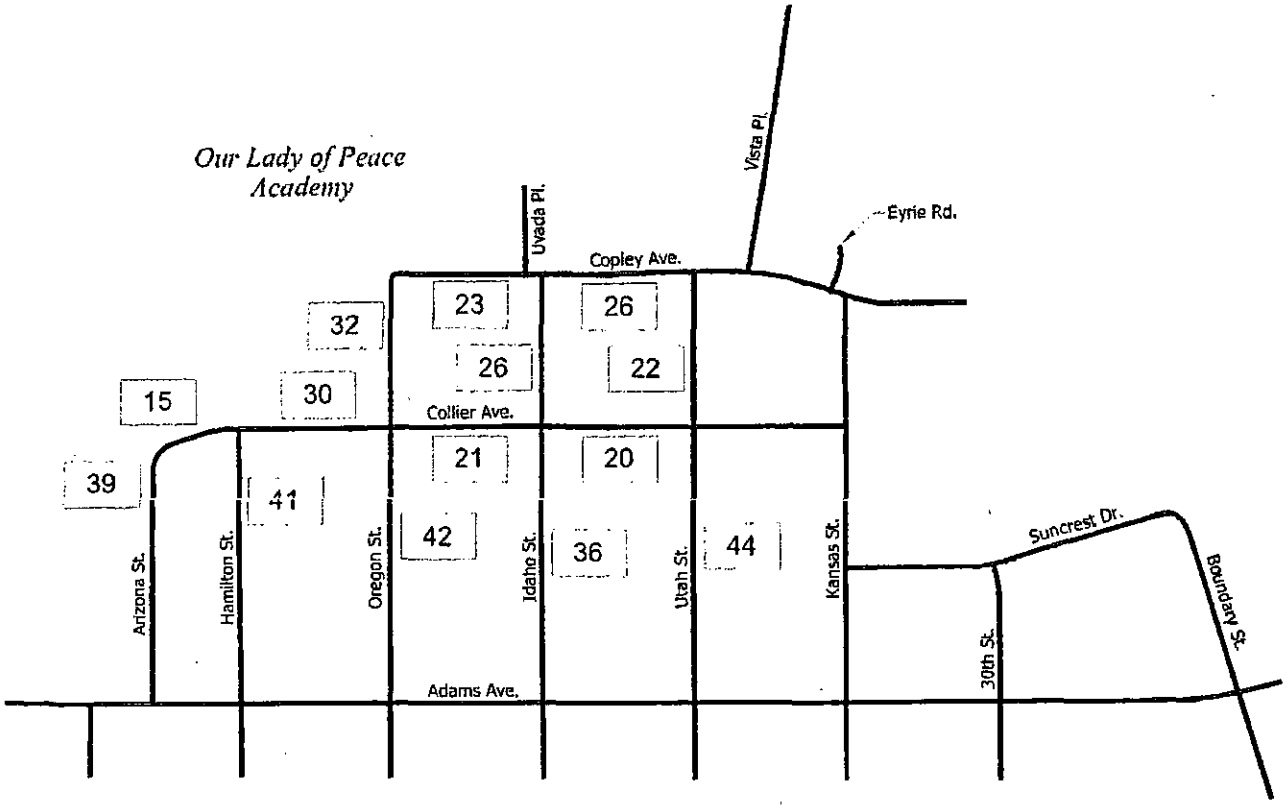
Source: Urban Systems Associates, 2008.

Issue 2: Would any existing conditions such as driveways, parking, and drop off points be closed or realigned as part of this project?

5.10.3.3 On-street Parking Survey

In order to obtain a better understanding of the parking demand, where students park their vehicles and the availability of spaces on-street, a parking inventory and survey was conducted as part of the Traffic Impact Analysis. Figure 5.10-5 depicts the number of parking spaces that are typically available for use by residents and students. As shown on Figure 5.10-5, there are a total of approximately 417 on-street parking spaces within a two-block walking distance to the school. There may be some slight variations in the number of available spaces due to the size of the parked vehicles and the efficiency of parking. In addition to the determining the total number of available parking spaces, surveys were conducted before school (6:00 AM) and after school (3:30 PM). Figures 5.10-6 and 5.10-7 summarizes the results of these surveys. As shown on both figures, before and after school, a considerable number of parking spaces are available at all times. Table 5.10-7 summarizes all of the parking survey data.

As provided in Table 5.10-7, a total of 417 onstreet parking spaces are available for use within a two-block distance of the school. Before school, the survey revealed that 154 spaces or 37 percent of available parking is not used by residents. During school, on the two survey days shown in the Table 5.10-7, between 100 and 113 spaces were available and unused. This is approximately 25 percent of the total number of spaces available. After school, the vacant number of spaces increases to 234 spaces or 56 percent of available spaces. With the proposed parking structure, the surplus on-street parking availability should increase. Therefore, no impact to on-street parking is anticipated with the implementation of the proposed project.



LEGEND

XX = Number of Available Parking Spaces Per Block, Both Sides of The Street

NOTE

Survey conducted within two blocks of the school.

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NO SCALE

SOURCE: Urban Systems Associates, 2008

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On Street Parking Supply

FIGURE 5.10-5

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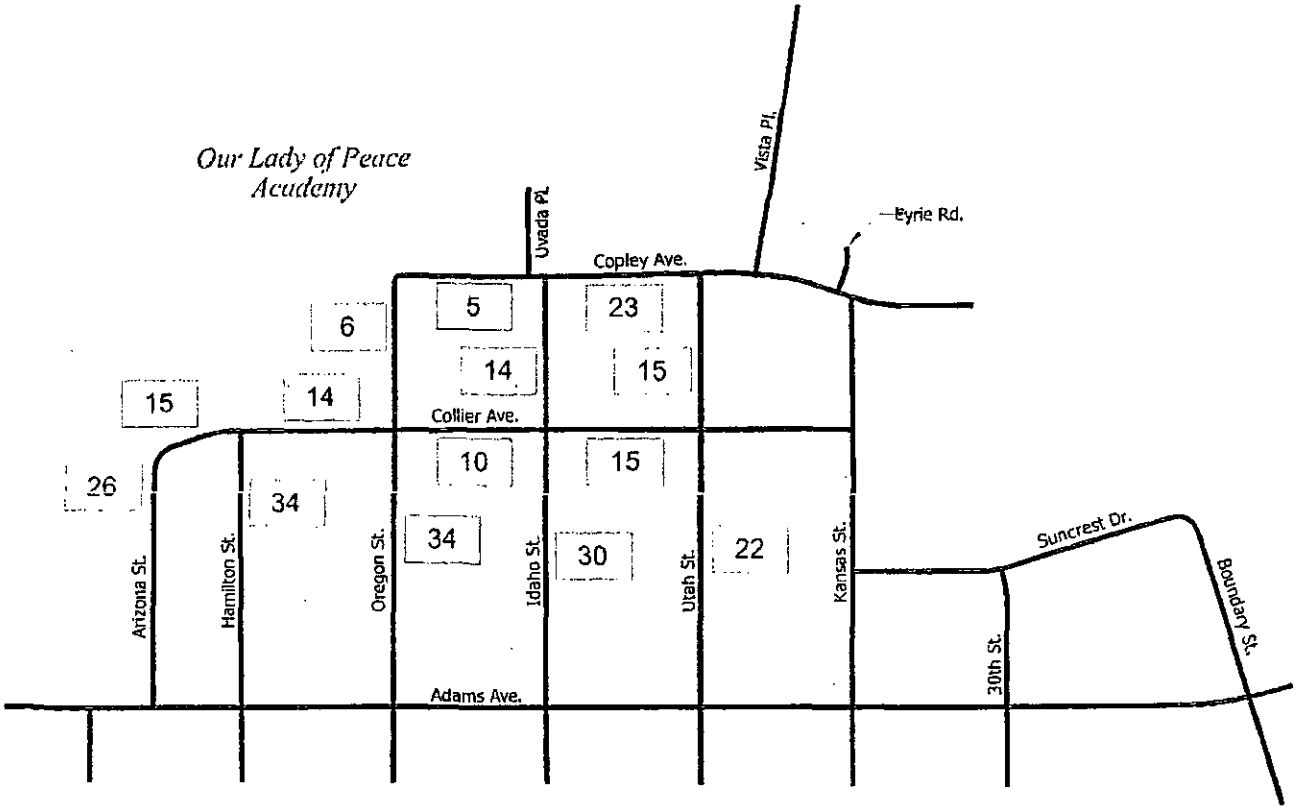

LEGEND

XX = Parked Vehicles Per Block, Both Sides of The Street

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NO SCALE

SOURCE: Urban Systems Associates, 2008

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Before School Parking

FIGURE 5.10-6

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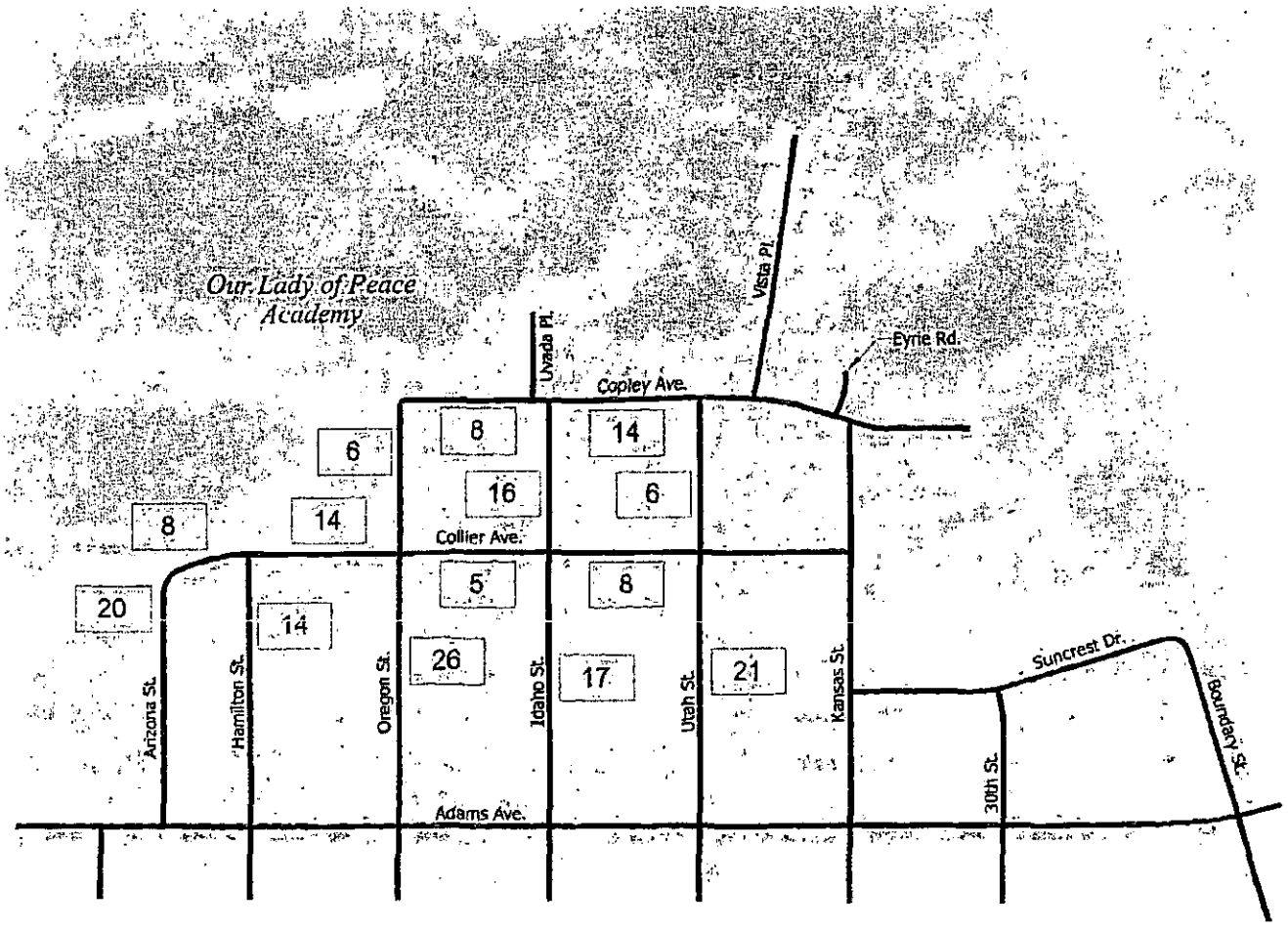

SOURCE: Urban Systems Associates, 2008

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After School Parking

FIGURE 5.10-7

F:\projects\635 Academy of Our Lady of Peace\Chapter 5\Figure 5.10-7 After School parking.ai

TABLE 5.10-7
Summary of On-Street Parking Survey Data

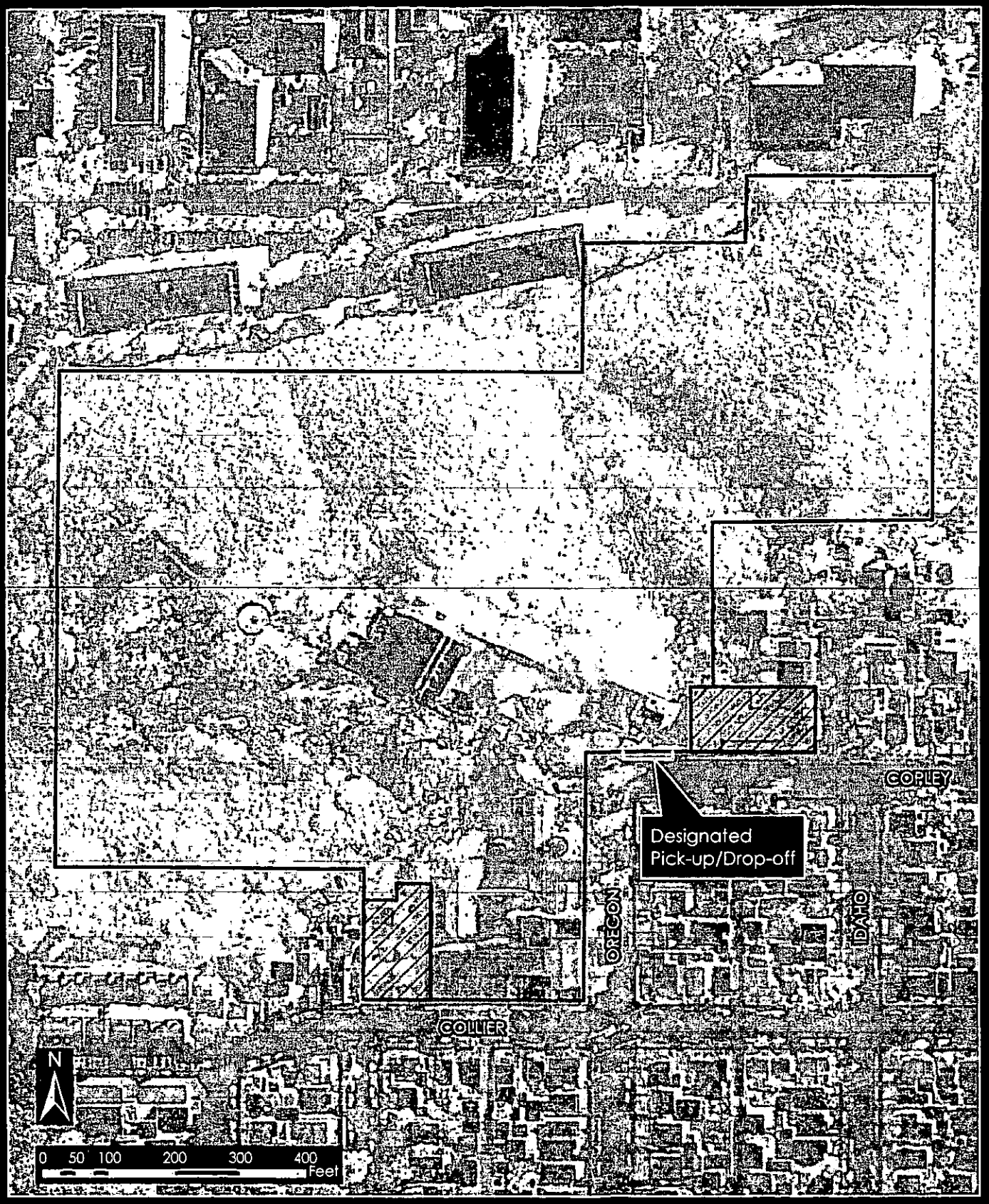
Street/Block	Total	Before School 4/16/2008		During School 4/14/2008		During School 4/18/2008		After School 4/18/2008	
		Occupied	Vacant	Occupied	Vacant	Occupied	Vacant	Occupied	Vacant
Arizona St. 4700	39	26	13	27	12	26	13	20	19
Hamilton St. 4700	41	34	7	29	12	26	15	14	27
Oregon St. 4700	42	34	8	38	4	34	8	26	16
4800	32	6	26	32	0	32	0	6	26
Idaho St. 4700	36	30	6	25	11	23	13	17	19
4800	26	14	12	24	2	24	2	16	10
Utah St. 4700	44	22	22	24	20	27	17	21	23
4800	22	15	7	14	8	8	14	6	16
Collier St. 2500	15	15	0	12	3	13	2	8	7
2600	30	14	16	28	2	24	6	14	16
2700	21	10	11	17	4	19	2	5	16
2800	20	15	5	12	8	18	2	8	12
Copley St. 2700	23	5	18	19	4	16	7	8	15
2800	26	23	3	16	10	14	12	14	12
Totals	417	263	154	317	100	304	113	183	234
Percent Vacant		37%		24%		27%		56%	

Source: Urban Systems Associates, 2008.

5.10.3.4 *Existing Operational Issues*

In addition to the on-street parking survey, traffic flow near the school during arrival and departure periods was observed. There is currently a designated drop-off and pick-up location located along Copley Avenue (see Figure 5.10-8). This designated drop-off and pick-up location is identified with a "Begin Sign" located just before entrance to the existing parking lot and an "End Sign" located just before entrance to Circle Drive. These signs read: "Begin 3 minute Passenger Loading 7 a.m. - 3 p.m. School Days" and "End 3 Minute Passenger Loading 7 a.m. - 3 p.m. School Days." Congestion was observed along both Oregon Street and Collier Avenue frontage of the school. In addition, congestion was also observed at the intersection of Oregon Street and Collier Avenue. Congestion on these roadways is considered a significant impact of the project. The congestion problems were very short in duration and fairly typical of schools and other uses that have compressed arrival and departure times (i.e., before and after school). Furthermore, the implementation of Mitigation Measure TCP-1 and TCP-2 is proposed to reduce this impact (Impact TCP-1) below a level of less than significant. Mitigation Measure TCP-1 requires the Academy to continue to use a facilitator during critical drop off and pick up congestion periods and Mitigation Measure TCP-2 requires that the parking structure access be limited to right turns in (from Copley) and right turns out. This approach, particularly at the morning and afternoon peaks would smooth traffic flow by not introducing the conflicts that would be related to crossing traffic patterns which would be created if left turns out or in to the parking structure were permitted.

Although a required element of the existing CUP, a pick up and drop off area on site specifically using Circle Drive is not recommended at this time (USA, 2008). The use of Circle Drive is not recommended because there would be significant changes in circulation conditions due to the proposed development of



SOURCE: SanGIS, 2008; Digital Globe, 2007; BRG Consulting, Inc., 2008

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Location of Designated Pick-up/Drop-off

FIGURE 5.10-8

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F:\projects\635 Academy Our Lady of Peace\3rd Screencheck EIR\Chapter 5\Figure 5.10-8 Location of Designated Pick-up Drop-off.mxd

the parking structure just east of Circle Drive. If Circle Drive gates are open, traffic trying to access or depart from the parking garage would be impeded (Urban Systems Associates, 2008). This is because of the left turns in to Circle Drive which would conflict with vehicles dropping off i.e. Westbound on Copley Avenue or exiting the garage. *Instead it is recommended that monitoring of traffic be conducted once* the parking garage is open and the other proposed mitigation measures are implemented. If a problem with pick up and drop off still exists, and the use of Circle Drive is a solution, the measure can be implemented at that time.

Another issue that was identified through the Academy's community outreach effort, not field observation, was concerns about on street parking, littering and inappropriate behavior such as impeding driveway access or noise. *However, implementation of Mitigation Measures TCP-2 (limited access for parking* structure) and TCP-3 (Parking Control Program) are proposed to mitigate these impacts (Impact TCP-2) to below a level of significance.

The proposed new parking structure would reduce existing congestion and parking issues by providing new on site parking which does not presently exist. Circulation of vehicles around the neighborhood looking for a parking space would also be reduced, as more students would have a designated place to park.

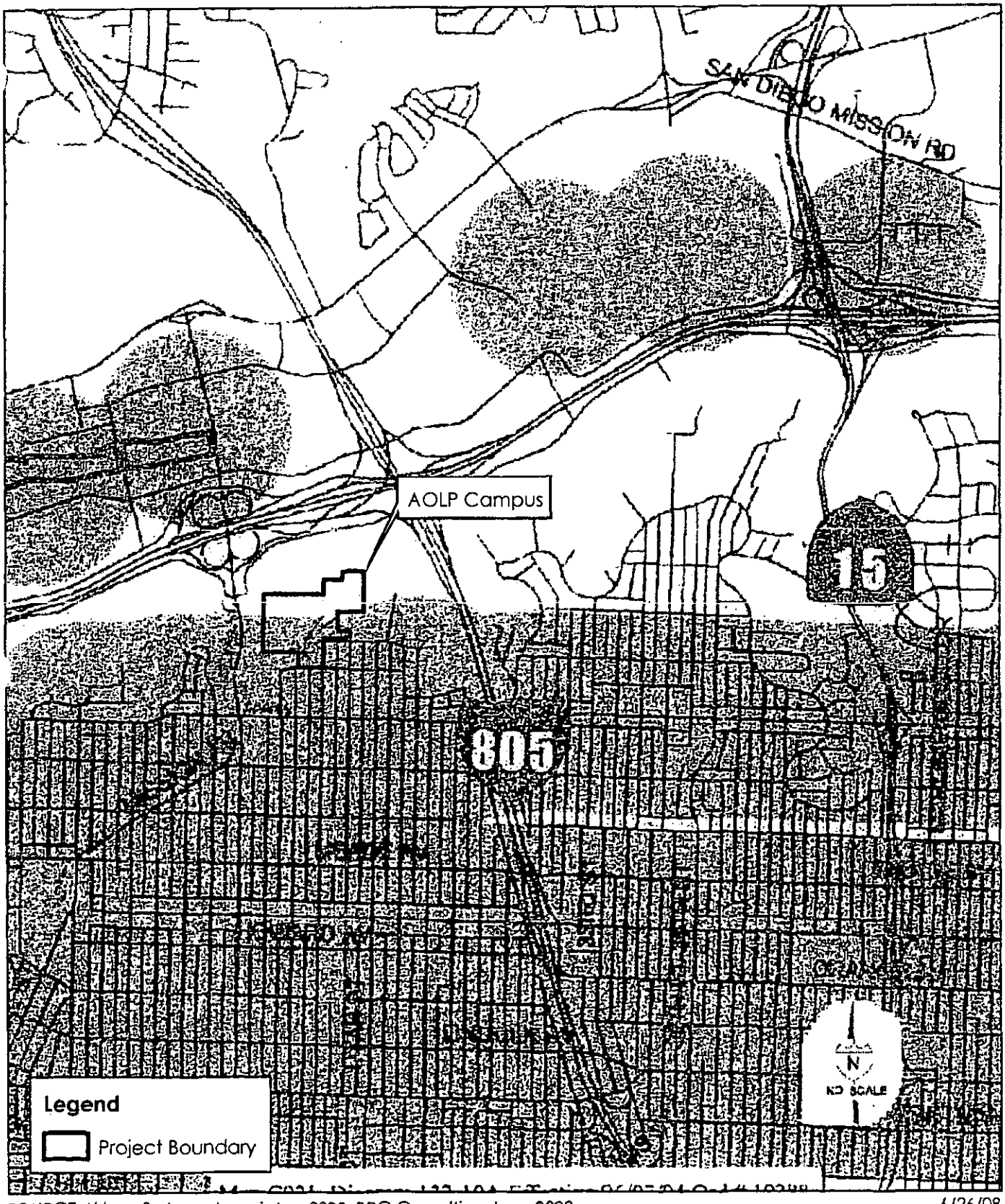
Another issue observed and identified in the Academy's community outreach effort was speeding. Although the City has traffic control officers responsible for speeder control and the Academy, implementation of Mitigation Measure TCP-4 (use of special enforcement by the City) is proposed to mitigate this impact to below a level of significance and requirement that the applicant work with the City to identify other feasible traffic calming measures.

Issue 3: Would the proposed project result in a parking deficiency that would substantially impact adjacent residential or commercial uses?

5.10.3.4 Parking

Non-residential parking requirements are established by the City's Municipal Code. More specifically Table 142-05F of the code specifies parking requirements for non-residential uses such as schools. Table 5.10-8 provides the calculation of required parking. The code requirements for institutional uses were used in this *analysis. As shown in the code for freshmen (9th Graders), 2 spaces per classroom are required.* This is consistent with the policy of the Academy, which does not allow freshmen to drive to school. Based on 30 freshmen per classroom, up to 210 freshmen and seven (7) classrooms, 14 spaces would be required. As depicted on Figure 5.10-9, the project site is located within a transit overlay zone and being within a transit area overlay zone, 85 percent of the base requirement is needed which equals 12 spaces.

For Grades 10-12, the base parking requirement is 1 space per 5 students. For a total of 540 students (750 - 210 *freshmen),* a total of 108 spaces are required. Based on the transit overlay zone, 92 spaces are required. The total parking required for the proposed enrollment is therefore 12 spaces (9th Grade) + 92 spaces (10-12 Grade) for a total of 104 spaces.



SOURCE: Urban Systems Associates, 2008; BRG Consulting, Inc., 2008

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Transit Overlay Zone

FIGURE 5.10-9

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TABLE 5.10-8
Parking Requirements

Per City of San Diego Municipal Code (Table 142-05F)					
Class	Number	Classrooms	Rate	Parking	Transit Overlay x 0.85
Freshman	210	7	2/class	14	12
Sophomore/ Junior /Senior	540	N/A	1/5 students	108	92
Total					104

Source: Urban Systems Associates, Inc., 2008.

Parking proposed for the project includes 8 surface spaces and 86 parking structure spaces for a total of 94 spaces. This is 10 spaces less than that required by code. An alternative parking structure project includes a third level with a total of 120 spaces plus the 8 surface spaces for a total of 128 spaces (see Section 9.0, Alternatives of this EIR). The Academy is proposing a two level parking structure rather than a larger parking structure (i.e., 3-level parking structure) that would meet the code requirements for parking. In order to meet the code requirements for parking, a larger structure would need to be constructed (i.e. three levels), which would exceed the allowable height requirement by 1.5 feet at the northwest corner. Based on the Academy's outreach with the community and on-street parking survey, the smaller parking structure would be more favorable. As such, with the proposed two-level structure the project would be underparked by 9.6 percent Implementation of the proposed project would require City's discretionary approval of the proposed project, provided that adequate Findings are provided by the applicant in support parking deviation from the Municipal Code.

EIR Section 4.0 History of Project Changes describes the changes that the Applicant has made to the project as a result in permit and environmental review, and community concerns. These changes include the reconfiguration of the parking structure layout to accommodate a total of 94 parking spaces, whereas, 91 parking spaces was originally proposed. As stated in the City's Significance Determination Thresholds (January 2007), "Non-compliance with the City's parking ordinance does not necessarily constitute a significant environmental impact. However, it can lead to a decrease in the availability of existing public parking in the vicinity of the project. Generally, if a project is deficient by more than ten percent of the required amount of parking and at least one of the following criteria applies, then a significant impact may result." Because the previously proposed, 91-space two-level parking structure would have been deficient by 12.5%, the Applicant revised the parking layout, including altering the location of structural features, in order to accommodate the three additional spaces and decrease the deficiency to less than 10% (i.e., 9.6%). However, the impact is still considered significant, and unmitigable. Section 9.0 Alternatives addresses alternatives to the project that would provide parking in compliance with Municipal Code requirements.

Existing CUP Parking Calculation. The existing CUP required 106 parking spaces. This was derived based on incorrectly applying a Municipal Code parking formula for senior high schools of one space for each 1.25

faculty/staff members and one space for each eight (8) students. Based on the then (1994) student enrollment of 631 and 45 faculty/staff, 115 parking spaces would be required. However, staff recommended that 11 spaces proposed in the lawn area of the main entry "loop" (aka Circle Drive) be eliminated to preserve the historic character and setting of the original 1914 building layout, resulting in a total of 106 parking spaces on site (City of San Diego, August 4, 1994).

Construction

During construction of the proposed classroom building and parking structure, existing on-site parking spaces would not be available. The classroom building site (Lot "A") currently provides 21 spaces, and the parking structure site (Lot "B") currently provides 38 spaces. In the event that the proposed classroom building and parking structure construction occurs simultaneously, a total of 59 on-site parking spaces would not be available. As such, there is a potentially significant impact as a result of loss of parking during construction (approximately six months) of either the classroom building or parking structure, or both components if construction occurs simultaneously. Implementation of Mitigation Measure TCP-5 (requires the Academy to provide off-street parking spaces at a remote location during construction) would reduce the impact to a level less than significant.

Issue 4: Would the project provide pedestrian and bicycle facilities to accommodate non-vehicular travel within the project area? Would the project provide off-site connections and linkages to facilitate pedestrian and bicycle beyond the project area?

5.10.3.5 Pedestrian and Bicycle Facilities

Currently, sidewalks are provided along roadways adjacent to the campus to provide walkways to the school for pedestrians. The proposed project would include landscape renovations which would include sidewalk improvements adjacent to the Academy. In addition, no additional off-site connections and linkages to facilitate pedestrian and bicycle travel beyond the project site are proposed. The proposed project would continue to use the existing facilities currently used by the campus and no impact is anticipated.

5.10.4 Significance of Impacts

The following operational issues have been identified as significant impacts of the proposed project:

- Existing congestion along Oregon Street and Collier Avenue and at the intersection of Oregon Street and Collier Avenue for short periods before and after school;
- Onstreet parking, littering and inappropriate behavior such as impeding driveway access or noise;
- Speeding along streets within the surrounding community.

There is also a potentially significant impact as a result of loss of parking during construction of either the classroom building or parking structure, or both components if construction occurs simultaneously.

In addition, the proposed project would result in a significant and unmitigable transportation/traffic circulation/parking impact, because the project does not meet the on-site (off-street) parking requirements per the City's Municipal Code for an institutional use and no mitigation measure has been identified that would reduce the impact to a level less than significant.

5.10.5 Mitigation Measures

TCP-1 The Academy shall continue to use a traffic facilitator, which would be two school employees, one on each street, that would be assigned the task of keeping traffic moving during critical drop off and pick up congestion periods. The existing designated pick-up/drop-off location on Copley Avenue shall be maintained (see Figure 5.10-8) In addition, any school personnel that performs the facilitator function shall receive proper police special events safety instruction, wear proper safety clothing and obtain any necessary City authority or permits that may be related to this function.

TCP-2 Based on field observations and the new parking structure design and location, the parking structure access shall be limited to right turns in (from Copley) and right turns out.

TCP-3 The following measures shall be implemented to reduce impact of students parking on nearby residential streets:

- To more closely control these types of issues, a parking control program shall be implemented, similar to the Saint Augustine High School's program.
- Each student permitted to drive shall be issued a colored (by class) and numbered (each student) I.D. card, which is displayed on a vehicles dashboard where it is accessible. Vehicle descriptions and license numbers shall be correlated to the student I.D. Areas shall be designated for parking by class and number of students. Anyone that is not accommodated on site in the new parking structure shall be permitted to park in their designated areas. Neighbors and students shall be instructed to report any issues or problems and based on the identification of any student vehicle appropriate enforcement action can be taken. Students shall sign a pledge to comply with school requirements in exchange for the privilege to park at school or on nearby streets.
- Reduce the peak AM 30-minute arrival problem by providing a study room with refreshments to encourage early (7:00 AM) arrivals. The more people that arrive before the 7:15 – 7:30 peak arrival time the better. Presently only 8 percent of seniors, 7.6 percent of juniors, 0.55 percent of sophomores and 1.9 percent of freshmen arrive at school before 7:00 AM.

TCP-4 Special enforcement shall be scheduled by the City based on close cooperation with the school's administration or based on citizen complaints. The applicant shall consult with the City to identify other feasible traffic calming measures that may be warranted to ensure continued facilitation and traffic flow during peak pick-up and drop-off periods.

TCP-5 During construction of the classroom building, the equivalent of 21 parking spaces shall be provided at a remote location with the provision of busing from the designated off-site location to and from the campus if the proposed parking structure has not been constructed. During construction of the parking structure, which is anticipated to be constructed first, the equivalent of 38 spaces shall be provided at a remote location with the provision of busing from the designated off-site location to and from the campus. If both project components are constructed simultaneously, a total of 59 spaces shall be provided at a remote location with the provision of busing from the designated off-site location to and from the campus.

5.10.6 Conclusion

Implementation of Mitigation Measures TCP-1, TCP-2, TCP-3, TCP-4, and TCP-5 would reduce all impacts to transportation/traffic circulation to a level less than significant. The proposed project would still have a significant and unmitigable parking impact due to the proposed deficit of spaces proposed on-site per the City's Municipal Code. No mitigation measure has been identified with the proposed project that would reduce the impact to below a level of significance; however, alternatives are presented in Section 9.0 and if implemented could fully mitigate this impact. The implementation of the proposed project would require the City's discretionary approval of the proposed project, provided that adequate Findings in support of the necessary parking deviation from the Municipal Code.

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5.11 Human Health/Public Safety/Hazardous Materials

5.11.1 Existing Conditions

The project site currently includes a private all-girl high school and three single-family homes. According to the U.S. EPA (Environfacts), the DEH HAZMAT list, State Department of Toxic Substances Control (DTSC) "Cortese List", there are no hazardous waste sites located within or adjacent to the project site. However, in response to the Notice of Preparation for the Draft EIR, the Department of Toxic Substances Control identified the potential for older structures (i.e., the three residences proposed to be demolished) to contain lead-based paint, asbestos, and/or organochlorine from termiticide application.

The project site is also located in an area subject to the City's brush management regulations due to the adjacent steep slopes and dense vegetation and adequate access for life safety vehicles on campus is required. As discussed in Section 5.3 Geology/Soils, the school has complied with the City's Unreinforced Masonry (URM) ordinance by retrofitting all the required buildings.

5.11.2 Impact Thresholds

The City of San Diego Significance Determination Thresholds outlines the thresholds for determining significance. Impacts to human health/public safety/hazardous materials may be considered significant if the project could:

- *Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials;*
- *Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment;*
- *Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and,*
- *Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residencies are intermixed with wildlands.*

5.11.3 Impacts

Issue 1: Would the proposed project result in the release of hazardous materials with the demolition of the three structures?

Due to the age of the three structures proposed to be demolished, there is a potential that these structures potentially contain asbestos materials, lead based paint, and/or organochlorine pesticides from termiticides. The project would be required to comply with all regulations regarding the demolition and disposal of potential hazardous materials (e.g., asbestos, lead based paint, and organochlorine pesticides).

Therefore, with the implementation of the proposed project a significant impact to human health/public safety/hazardous materials is identified. However, with the implementation of Mitigation Measure HH-1, this impact would be mitigated to below a level of less than significant.

Issue 2: Would the proposed project expose people or structures to significant fire risk?

The proposed project is located adjacent to a densely vegetated slope that poses a potential risk for a wildland/brush fire and is a potential public safety impact of the project. This is considered a significant impact related to fire safety. However, with the implementation of Mitigation Measure HH-2, this impact would be mitigated to below a level of less than significant. As required by Mitigation Measure HH-2, the proposed project would be conditioned to comply with fire safety conditions as required by the City. These conditions include the establishment and maintenance of appropriate fuel modification zones, sprinkler systems within the structures, and adequate fire access to the site. (Fire access driveways are provided at the classroom building and parking structures.) As depicted in Figure 3-3 in the following section of this EIR, a fire access lane would be provided to the project site adjacent to the classroom building. This access lane would have access from Collier Avenue. All of the access gates and other fire access lanes that currently exist on the project site will continue to remain accessible to the fire department. All of the access gates will continue to use a Knox key boxes, which allow the fire department to access the school in an emergency without school personnel present. In addition, based on initial consultations and plan reviews with the Fire Department, no turn-a-rounds are required for the proposed project. All of these conditions would be included in the design of the proposed project, which would be verified and approved by the City. The City's Landscape Review Division has reviewed the proposed project and landscaping plans, and required fuel modification zones have been established for the proposed project. The required fuel modifications zones are depicted in Figure 5.2-1 Biological Resources. Additionally, pursuant to fire department requirements, the proposed buildings are required to have fire sprinklers, and a new fire hydrant will be required. The proposed classroom building requires more than 150 feet hose coverage and the entire structure would contain a fire sprinklers system. The basement (subterranean floor) of the parking structure is also required to have fire sprinklers and a Class 2 Standpipe would be provided on the Parking Structure Upper Floor and the project would meet all other applicable fire code requirements.

5.11.4 Significance of Impacts

The implementation of the proposed project would result in a significant human health/public safety/ hazardous materials impact associated with the potential presence of hazardous materials in the structures proposed to be demolished as well as potential fire safety.

5.11.5 Mitigation Measures

HH-1 Prior to building demolition, a survey shall be conducted to determine the locations and amounts of asbestos-containing materials (ACMs), lead-based paints (LBPs), and organochlorine pesticides, if any. Based on the potential current and historical presence of LBPs on exterior building surfaces, the potential presence of lead or organochlorine pesticide contamination in shallow soils shall be assessed. Should ACMs or LBPs be encountered in the site structures, a licensed abatement

contractor shall be contracted to remove hazardous materials before demolition activities commence.

HH-2 The proposed project shall comply with the fire safety conditions as identified by the City prior to issuance of the building permit. These conditions include: 1) the establishment of appropriate fuel modification zones as required by the City landscape review; 2) retention/provision of adequate fire/emergency vehicle access on to the campus; 3) sprinklers in the proposed classroom building and subterranean floor of the parking structure; 4) replacement fire hydrant; and, 5) provision of Class 2 Standpipe on the parking structure upper floor.

5.11.6 Conclusions

Implementation of Mitigation Measure HH-1 and HH-2, which requires the establishment of fire control measures (e.g., fuel modifications zones and sprinklers) would reduce the impact to human health/public safety/hazardous materials to a level less than significant.

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6.0 EFFECTS NOT FOUND TO BE SIGNIFICANT

CEQA Guidelines §15128 requires that an EIR contain a brief statement disclosing the reasons why various possible significant effects of a proposed project were found not to be significant and, therefore, would not be discussed in detail in the EIR. The environmental issues not expected to have a significant impact as a result of the proposed project are Agricultural Resources/ Mineral Resources, Air Quality, Energy, Population and Housing, Public Services and Facilities (schools, libraries, parks and recreation, and water conservation.

6.1 Agricultural Resources/ Mineral Resources

6.1.1 Agricultural Resources

The project site is located in an urbanized area and does not contain prime farmland, unique farmland or farmland of statewide importance. The project site is not under Williamson Act contract and is not designated for agricultural use. Therefore, implementation of the proposed project would not result in a significant impact to agricultural resources.

6.1.2 Mineral Resources

The project site is located within a MRZ-3 classification area. The MRZ-3 area is defined as an area containing mineral deposits; however, the significance cannot be evaluated from available data (California, 1982). However, the project site is located within an urbanized environment with existing development on-site and is not currently being mined. Since the site is relatively small in size and is surrounded by existing urban development, it is unlikely that the site could support economically feasible mining operations. Therefore, there are no identified mineral resources that would be affected as a result of this project and there would be no impact.

Significance of Impact

Implementation of the proposed project would not result in a significant impact to agricultural resources and mineral resources.

6.2 Air Quality

The proposed project would continue to generate mobile emissions and stationary emissions. Motor vehicles (mobile emissions) are the primary source of emissions associated with the proposed project. Stationary sources include two types: point and area. Point sources are those which are specific sites that have one or more emission sources at a facility with an identified location (e.g., industrial operations, power plant). Area sources comprise many small emission sources (e.g., homes, offices, and retail shops) which do not have specifically identified locations, but for which emissions can be calculated using per unit standards. The proposed project involves the construction of a two-story classroom building (21,770 gross square feet), and the construction of a two level parking structure (consisting of one subterranean level,

and one at-grade level) to provide 91 on-site parking spaces. The proposed project would generate a small amount of stationary emissions as the land use type proposed would emit only small amounts of non-point pollutant emissions. No industrial uses are proposed as part of the project that typically emit large amounts of air pollutant emissions. Vehicular trips (mobile emissions) to and from the proposed land uses would continue to be the primary source of air pollutant emissions, specifically carbon monoxide (CO).

The proposed project would amend the CUP to allow the student enrollment to increase from the currently permitted level of 640 students to 750 students. The increase in permitted student enrollment would result in a theoretical increase of vehicular trips resulting from the transport of the additional students to and from school. However there would be no increase from existing conditions because the school current enrollment is 750 students. The increase of 110 students, and the associated vehicle trips, is not considered significant in regards to impacts on air quality and mobile emissions as the emissions generated would be less than CEQA significance thresholds. Although not in compliance with the existing CUP, the current student enrollment is 750 students. Therefore, there would be no effective increase in vehicular trips than are currently generated at the school.

According to the City of San Diego Significance Thresholds, a project would result in a significant impact if it results in a considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality plan. The City of San Diego is designated as "non-attainment" for ozone and particulate matter. Operation of the proposed project does not include any activities, emissions, or odors which would significantly affect regional air quality concerns such as ozone, hydrocarbons, or nitrogen oxide (NO_x) levels, or site-specific concerns such as CO levels. Implementation of the proposed project would not cause any federal or state air quality standards to be exceeded or conflict with or obstruct implementation of the RAQS or SIP.

According to the City of San Diego Significance Thresholds, a project would have a significant impact on air quality if it exposes sensitive receptors to substantial pollutant concentrations. According to the South Coast Air Quality Management District CEQA Air Quality Handbook, a sensitive receptor is a person in the population (or the facilities that house them) who is particularly susceptible to health effects due to exposure to an air contaminant than is the population at large. Schools are considered to be sensitive receptors to pollutant concentrations. However, the proposed project would not expose sensitive receptors to substantial pollutant concentrations nor would the proposed project emit substantial amounts of pollutant concentrations. In addition, the proposed project includes the development of a parking structure, which would become a destination for students to park in and would likely alleviate student circling around the surrounding neighborhood searching for parking. In addition, as discussed in Section 5.10 Transportation/Traffic/Parking of this EIR, traffic control measures would be implemented during school drop-off and pick-up hours to ensure proper movement of vehicles and reduce the number of idling vehicles. As such, the development of the parking structure would not result in a significant increased concentration of air pollutants. Therefore, no impacts to sensitive receptors would result from implementation of the proposed project.

Air emissions would be generated during construction activities associated with the development of the proposed classroom building, parking structure and landscape improvements during demolition, grading and excavation, building and utility construction, and paving activities.

During the demolition phase of the proposed project, three residential dwelling units would be demolished. During demolition activities, the primary pollutants generated are NO_x, (which are generated by on-site and off-site construction vehicles) and dust [i.e. particulates less than 10 microns in diameter (PM_{10})]. During site grading and excavation, the primary pollutants generated are tailpipe emissions (CO), which are generated by construction related vehicles such as graders, bulldozers, water trucks, backhoes, rollers, loaders, and construction worker's vehicles. Emissions are also generated in the form of dust (PM_{10}) as a result of soil disturbance. Construction emissions vary from day-to-day depending on the number of workers, number and types of heavy-duty vehicles and equipment, level of activity, the prevailing meteorological conditions, and the length of time over which these activities occur. Additionally, the generation of reactive organic gas (ROG) emissions are typically associated with the applications of architectural coatings (e.g. paint) off-gasing.

During construction activity on the project site, federal, state, and local development standards and requirements that are designed to minimize air quality emissions would be implemented through standard development procedures. These measures, which also overlap with the NPDES requirements for dust control as discussed in Section 5.5 of this EIR, typically include, but are not limited to the following:

- Water or dust control agents would be applied to active grading areas, unpaved surfaces, and dirt stockpiles as necessary. All soil to be stockpiled over 30 days would be protected with a secure tarp or tackifiers to prevent windblown dust.
- Properly maintained diesel-powered on-site mobile equipment and use gasoline-powered on-site mobile equipment instead of diesel-powered mobile equipment, to the maximum extent possible.
- Wash-off trucks leaving construction sites.
- Replace ground cover onsite if it is determined that the site would be undisturbed for lengthy periods.
- Reduce speeds on unpaved roads to less than 15 miles per hour.
- Halt all grading and excavation operations when wind speeds exceed 25 miles per hour.
- Dirt and debris spilled onto paved surfaces at the project site and on the adjacent roadways would be swept or vacuumed and disposed of at the end of each workday to reduce suspension of particulate matter caused by vehicle movement.
- Cover all trucks hauling dirt, sand, soil or other loose material to and from the construction site and/or maintain a two-foot minimum freeboard.
- Use of low-emission reactive organic gas (ROG) paints.

Emissions generated during project construction phases (demolition, grading, and construction) would not exceed the SDAPCD construction emissions thresholds. Furthermore, the proposed project would not conflict with or obstruct implementation of the any applicable air quality plan or violate any air quality standard.

6.2.1 Greenhouse Gas Emissions Analysis

Although a discussion of global warming impacts is not currently required by the CEQA Statutes or Guidelines, it is the view of the State Legislature as expressed in its adoption of AB 32 (*The California Climate Solutions Act of 2006*), that global warming poses significant adverse effects to the environment of the state of California and the entire world.

6.2.1.1 *Existing Conditions*

As described in Chapter 2 Environmental Setting, the existing Academy campus facilities include buildings constructed as early as 1927, and as recent as 1996. The total existing building square footage is 86,035 square feet. Current annual kilowatt hour (kWh) usage is approximately 451,000.

6.2.1.2 *Proposed Conditions*

The proposed project would increase the overall square footage of the Academy campus facilities by 21,059 square feet of habitable area (classroom building). The parking structure would utilize electricity associated with lighting, gate operation, and the elevator.

6.2.1.3 *City of San Diego General Plan*

The California Office of the Attorney General identifies a series of mitigation measures that may reduce potential global warming impacts associated with a proposed project. These measures address such broad categories as energy efficiency, renewable energy, water conservation and efficiency, solid waste measures, land use measures, transportation and motor vehicles, and carbon off-sets.

The City of San Diego's Conservation Element (CE) of the General Plan establishes comprehensive policies that would reduce the greenhouse gas (GHG) emissions of future development, the existing community at-large, and City operations. A key Conservation Element policy is to "reduce the City's carbon footprint" and to "develop and adopt new or amended regulations, programs and incentives as appropriate to implement the goals and policies set forth" related to climate change (CE-A.2). During the General Plan Update process, additional policies were added to "collaborate with climate science experts" to allow informed public decisions (CE-A.3) and to "regularly monitor and update the City's Climate Protection Action Plan (CE-A.13)." The overall intent of these policies is to unequivocally support climate protection actions, while retaining flexibility in the design of implementation measures, which could be influenced by technological advances, environmental conditions, state and federal legislation, or other factors.

Also, during the General Plan Update process, the Land Use and Community Plan, Mobility, Urban Design, and Public Facilities, Services, and Safety elements of the General Plan were edited to better support GHG reduction and climate change adaptation goals. The elements contain policy language related to sustainable land use patterns, alternative modes of transportation, energy efficiency, water supply, and

GHG emissions associated with landfills *(City of San Diego, Draft General Plan Final Program EIR, Section 5.0 – Cumulative Impacts)*.

The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA, as well as analysis of projects for consistency with the goals, policies and recommendations of the General Plan. As provided in the Final Program EIR for the General Plan Update (Section 5.0 – Cumulative Impacts, page 5-32), "In general, implementation of the policies in the MMRP and the measures in the Action Plan discussed above as well as compliance with federal, state, and local regulations would avoid or reduce their incremental contribution to the significant worldwide increase in GHG emissions." Table CE-1 of the MMRP of the Final Program EIR for the General Plan Update identifies which elements of the General Plan address climate change and the specific section and policy.

6.2.1.4 *Proposed Measures*

A. Retrofit Lighting in Existing Buildings and Solar Energy

Concurrent with design of the proposed project and preparation of this EIR, the Applicant is assessing the feasibility of replacing all the lights in the existing buildings with high-efficiency lights. In addition, the Applicant is assessing the feasibility of installing solar panels on portions of the existing and proposed structures.

B. Leadership in Energy and Environmental Design (LEED)

Concurrent with design of the proposed project, the Applicant retained KEMA to provide a preliminary LEED review for new construction. The reviewer assessed the project site and a conceptual design for the proposed project. Below is a list of the LEED "Activities" that the reviewer identified as feasible for the proposed project.

Sustainable Sites

- Construction Activity Pollution Prevention
- Site Selection
- Development Density & Community Connectivity
- Site Development, Protect or Restore Habitat
- Site Development, Maximize Open Space
- Stormwater Design, Quantity Control
- Stormwater Design, Quality Control
- Light Pollution Reduction

Water Efficiency

- Water Efficient Landscaping
- Water Use Reduction

- Fundamental Commissioning of the Building Energy Systems
- Minimum Energy Performance
- Fundamental Refrigerant Management
- Optimize Energy Performance

Materials & Resources

- Storage & Collection of Recyclables
- Construction Waste Management, Divert 50% from Disposal
- Recycled Content (estimate of quantity of building materials to be used that are made from recycled materials)
- Regional Materials
- Certified Wood

Indoor Environmental Quality

- Outdoor Air Delivery Monitoring
- Increased Ventilation
- Construction IAQ Management Plan, during construction
- Low-Emitting Materials, Adhesives & Sealants
- Low-Emitting Materials, Paints & Coatings
- Low-Emitting Materials, Carpet Systems
- Low-Emitting Materials, Composite Wood & Agrifiber Products
- Controllability of Systems, Lighting
- Controllability of Systems, Thermal Comfort
- Thermal Comfort, Design
- Thermal Comfort, Verification

As an outcome of the preliminary LEED review, if the proposed project was designed and constructed to incorporate the LEED "Activities" identified during the review, the project could achieve 37 points, which equates to the Silver LEED certification. Many of the LEED "Activities" identified above implement the policies in the MMRP. For example, the proposed project may utilize energy efficient lighting (CE.A.6) within the new structure and all of the existing buildings and it may install solar panels, which are form of renewable energy (CE-I.5) (City of San Diego, 2008a). In that manner, the proposed project would avoid or substantially reduce contribution to GHG emissions.

Significance of Impact

Implementation of the proposed project would not result in a significant impact to air quality.

6.3 Energy

The proposed project involves the construction of a two-story classroom building (21,059 square feet), and the construction of a two-level parking structure (consisting of one subterranean level, and one at-grade level) to provide 91 on-site parking spaces. The proposed project would not affect local and regional energy supplies or require the development of new energy sources to service the proposed project. The proposed project would be developed in accordance with all applicable City of San Diego Energy Efficiency Standards and Title 24 requirements. Furthermore, the LEED Activities discussed above in Section 6.2.1.4 are also used to decrease the demands on energy sources.

Significance of Impact

Implementation of the proposed project would not result in a significant impact to energy resources.

6.4 Population and Housing

The proposed project includes the demolition of three single-family homes owned by the Academy of Our Lady of Peace, the construction of a two-story classroom building (21,770 gross square feet) and a two-level parking structure. The proposed project would not result in any increase of population in the area.

The State CEQA Guidelines, Appendix G, Items XII (b) and (c), state that a project may normally be considered to have a significant effect on the environment if it would displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere. The proposed project would include the removal of three single-family residences currently owned by the Academy of Our Lady Peace. In the past, these three single-family residences have been rented to tenants. The removal of three single-family residences would not displace a substantial number of houses or people.

Significance of Impact

Direct and cumulative impacts to population or housing would not result with implementation of the proposed project.

6.5 Public Services and Facilities

Please note, fire and police response is discussed in Section 2 – Environmental Setting of this EIR, and/or Section 5.11 Human Health/Public Safety/Hazardous Materials.

6.5.1 Schools

The proposed project would not add additional residents to the community; therefore, the project would not generate an additional demand on public schools. The proposed project would continue to provide the community with private educational facilities for a maximum enrollment of 750 students. Therefore, no impact would result.

6.5.2 Libraries

The proposed project would not add additional residents to the community; therefore, the project would not generate an additional demand on library facilities

6.5.3 Parks and Recreation

The proposed project would not add additional residents to the community; therefore, the project would not generate an additional demand on park and recreation facilities.

Significance of Impact

Implementation of the proposed project would; therefore, not result in a significant impact to public services or facilities.

6.5.4 Water Conservation

The proposed project would be implemented in compliance with the City of San Diego Municipal Code §147.04, with the installation of water-conserving plumbing fixtures in the new structures. Furthermore, the proposed landscape plan for the proposed project consists of a primarily drought tolerant species and spray head irrigation, which would ensure reduced water usage for landscaping. The project would place a relatively small demand for water use, and does not meet the threshold criteria necessitating the preparation of a Water Supply Assessment pursuant to SB 610.

Significance of Impact

The proposed project would not result in the use of excessive amounts of water and impacts to water availability would not be significant.

7.0 MANDATORY DISCUSSION AREAS

7.1 Significant Environmental Effects Which Cannot Be Avoided if the Project is Implemented

CEQA §21100 and CEQA Guidelines §15126.2(b) require that an EIR "describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance." Analysis of environmental impacts caused by the proposed project has been performed, and is contained in Section 5.0. The following identifies the significant impacts associated with the proposed project that cannot be avoided.

7.1.1 Historical Resources

The existing residences located at 2544 Collier Avenue and 2746 Copley Avenue have been determined to be significant historical resources. The buildings are considered to be architecturally significant as examples of the Spanish Eclectic style of architecture and meet the City of San Diego's Significance Criterion "C" (U.S. Department of the Interior, 1986:1, see page 40 of the City's CEQA Significance Determination Thresholds January 2007). The proposed project would involve demolition of these buildings in order to accommodate the proposed classroom building and parking structure. The demolition of these locally significant historic buildings is considered a *significant impact. Mitigation Measure HR-2* would reduce the impact to the extent feasible; however, the impact would remain significant. As proposed, impacts to these structures cannot be avoided if the project is implemented.

7.1.2 Land Use

The proposed project is consistent with, and implements a majority of the community plan goals and policies relative to the community facilities element, cultural and heritage resources element, and urban design element. However, the proposed two-level parking structure would result in a deficit of 10 spaces less than the 104 on-site spaces that are required by the City's Municipal Code for the proposed project. Therefore, the project directly conflicts with the Greater North Park Community Plan's objective to provide adequate off-street parking in residential and commercial areas. Also, the proposed project would *eliminate* two historic buildings located at 2544 Collier Avenue and 2746 Copley Avenue. These buildings have been determined to be historically significant as examples of the Spanish Eclectic style of architecture. As such, the project would conflict with the Community Plan's objectives to *"Preserve the architectural variety and residential character of Greater North Park," and to, "Preserve and restore unique or historic structures within the community."* These impacts are considered unmitigable; and can only be reduced or avoided by changing the project. Section 9.0 Alternatives analyzes alternatives that could avoid, or further reduce, these impacts. *As described in Section 5.6 Land Use, implementation of the* proposed project would also require approval of height deviations for the proposed classroom building, and setback deviations for the parking structure; however, approval of these deviations would not represent a significant land use impact as discussed further under Section 5.6 Land Use.

7.1.3 Traffic/Circulation/Parking

Parking proposed for the project includes 8 surface spaces and 86 parking structure spaces for a total of 94 spaces. This is 10 spaces less than the amount required by City code §142.0530. As such, the project will be underparked by 9.6 percent, resulting in a significant and unmitigated parking impact. As stated in the City of San Diego's Significance Determination Thresholds (January 2007), "Non-compliance with the City's parking ordinance (City Code §142.0530) does not necessarily constitute a significant environmental impact. However, it can lead to a decrease in the availability of existing public parking in the vicinity of the project. Generally, if a project is deficient by more than ten percent of the required amount of parking and at least one of the following criteria applies, then a significant CEQA impact may result." With respect to the proposed project, although the calculated parking deficit is lower than 10% the impact is considered significant (see Section 5.10 Transportation/Circulation/Parking) as it is not fully Code compliant. Implementation of the proposed project will require City's discretionary approval of the proposed project, provided that adequate Findings are provided by the applicant in support of the parking deviation from the Municipal Code. Section 9.0 Alternatives of this EIR addresses potential alternatives that could achieve parking code compliance.

7.2 Significant Irreversible Environmental Changes

CEQA §21100 and CEQA Guidelines §15126.2(c) require that an EIR analyze the extent to which the proposed project's primary and secondary effects would impact the environment and commit nonrenewable resources to uses that future generations would be unable to reverse.

The proposed project would not alter the existing development pattern within the project vicinity. Development of the project would result in an irreversible, although small, commitment of building materials. The proposed project would additionally result in a very minor consumption of nonrenewable energy resources throughout the life of the project for maintenance purposes. The loss of two historically significant structures would represent a significant irreversible environmental change that would occur as a result of the proposed project.

7.3 Growth Inducement

A project is regarded as growth-inducing if it can foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment (CEQA Guidelines §15126.2[d]). Included in this definition are projects that would remove obstacles to population growth, such as extending public services into areas not previously served. Growth inducement can also be defined as an action that would encourage an increase in density of development in surrounding areas or encourage adjacent development. Growth should not be assumed to be beneficial, detrimental, or of little consequence of the environment (CEQA Guidelines §15126.2[d]).

The proposed project is located within a built-out, urban area. The project site and surrounding area are currently developed with residential and commercial uses with utility service. Therefore, extension of public utility infrastructure such as water, sewer, electric, or roads into previously unserved areas would not occur

with implementation of the proposed project. Although the project includes certain improvements to existing utilities within the site, these improvements would serve only the project and would not extend off-site. New uses within the surrounding area would primarily require redevelopment of existing uses.

The project site is currently developed with single-family and school structures owned by the Academy of Our Lady of Peace. *Demolition* of these structures and development of a classroom building and parking structure would not foster economic or population growth such that construction of additional housing, either directly or indirectly, in the surrounding area would be required.

For the reasons explained above, the proposed project would not be considered significantly growth inducing.